



December 13, 2024

To: Stakeholders for the LS Power Grid California, LLC, 2025 Wildfire Mitigation Plan Update

Enclosed is the Draft Decision of the Office of Energy Infrastructure Safety (Energy Safety), presenting its evaluation of the LS Power Grid California, LLC, 2025 Wildfire Mitigation Plan Update.

This Draft Decision is published for public review and comment. Opening comments must be submitted no later than January 6, 2025. Reply comments must be submitted no later than January 16, 2025.<sup>1</sup>

Comments must be submitted to Energy Safety's e-filing system in the 2023-2025 Wildfire Mitigation Plans docket (2023-2025-WMPs).<sup>2</sup>

Sincerely,

          /s/ Tony Marino          

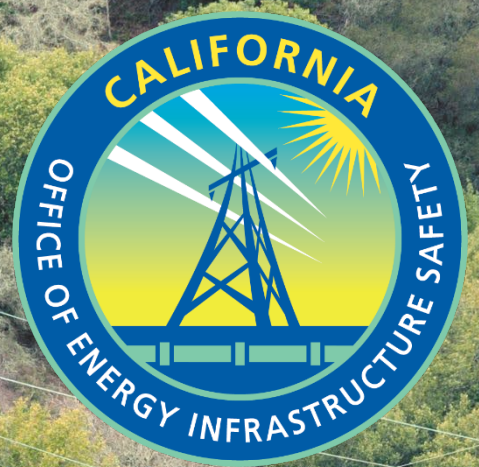
Tony Marino

Acting Deputy Director | Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

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<sup>1</sup> Dates falling on a Saturday 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 via the [2023-2025-WMPs docket](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs) on Energy Safety's e-filing system (<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>, accessed July 31, 2024).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

**DRAFT DECISION**

**LS POWER GRID CALIFORNIA, LLC**

**2025 WILDFIRE MITIGATION PLAN UPDATE**

December 2024

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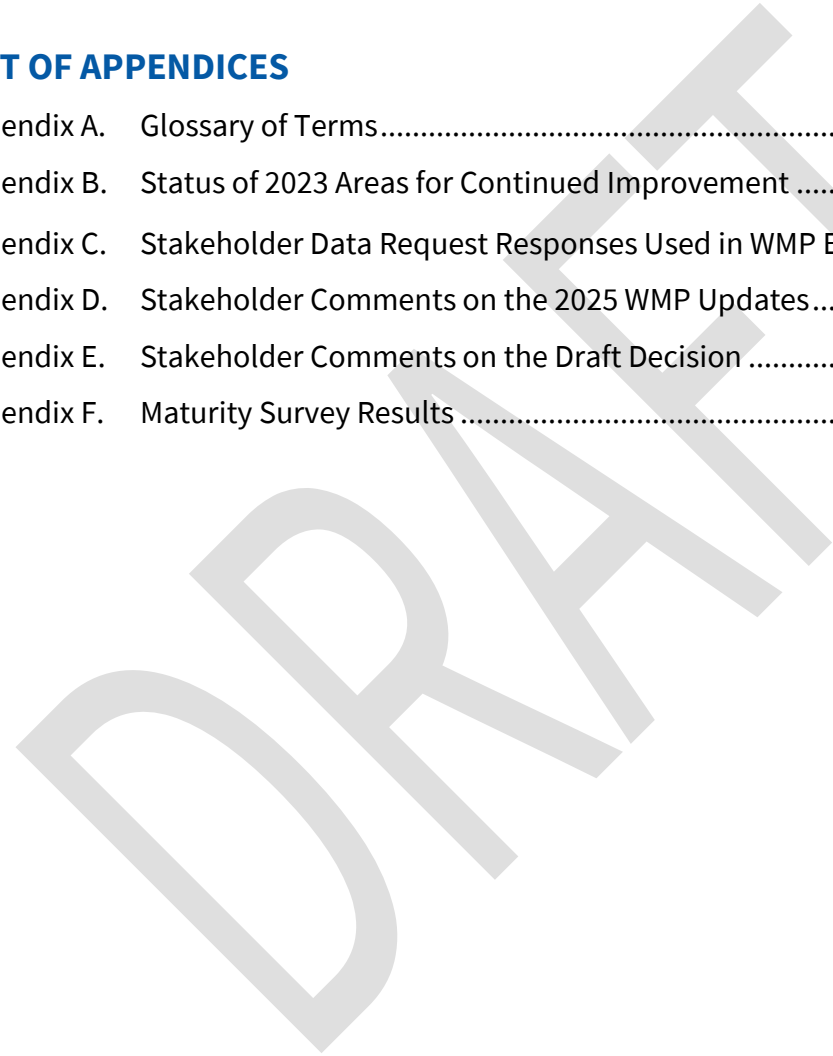
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# 1. Executive Summary

The Office of Energy Infrastructure Safety (Energy Safety) works to ensure electrical corporations take effective actions to reduce utility-related wildfire risk. This Decision approves LS Power Grid California, LLC's (LS Power's) 2025 Wildfire Mitigation Plan (WMP) Update, resubmitted September 18, 2024, pursuant to a Rejection and Order to Resubmit.

LS Power provided a total of 14 reportable updates in its 2025 WMP Update. These include four updates to approved targets, six changes to objective completion dates, two changes to quarterly inspection targets for 2025, one new program, and one report on progress required for an area for continued improvement.

The above-listed updates encompass four initiative categories. These include asset inspections, vegetation management and inspections, situational awareness and forecasting, and emergency preparedness.

Energy Safety evaluated LS Power's 2025 WMP Update and finds several strengths. For example, LS Power is improving its situational awareness and forecasting capabilities by implementing a new program to install dedicated weather stations on site at its substations. These improvements will allow for increased situational awareness and provide real-time weather monitoring and forecasting to help guide LS Power's operational decision-making. Additionally, LS Power is improving its vegetation inspection program by establishing quantitative targets.

Energy Safety also evaluated LS Power's response to a 2023 area for continued improvement which required progress by LS Power's 2025 WMP Update. LS Power responded by completing the tables in the emergency preparedness section of its Redlined 2023-2025 Base WMP, meeting Energy Safety's required progress. Energy Safety did not identify any new areas for continued improvement in its evaluation of LS Power's 2025 WMP Update. Therefore, LS Power is not required to report on any areas for continued improvement in its 2026-2028 Base WMP.

## 2. Introduction and Background

LS Power Grid California, LLC (LS Power) submitted its 2023-2025 Wildfire Mitigation Plan (2023-2025 Base WMP) in 2023.<sup>1</sup> Energy Safety approved LS Power's 2023-2025 Base WMP on January 30, 2024. On July 8, 2024, LS Power submitted its 2025 Wildfire Mitigation Plan Update (2025 WMP Update). On September 18, 2024, LS Power submitted its revised 2025 WMP Update<sup>2</sup> to its 2023-2025 Base WMP in accordance with Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines (2025 WMP Update Guidelines)<sup>3</sup> and Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (WMP Process Guidelines).<sup>4</sup>

On September 10, 2024, Energy Safety issued a Rejection and Order to Resubmit<sup>5</sup> for LS Power's 2025 WMP Update and received the resubmitted 2025 WMP Update<sup>6</sup> on September 18, 2024.

Pursuant to Public Utilities Code section 8386.3(a), this Decision approves LS Power's 2025 WMP Update to its 2023-2025 Base WMP.

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<sup>1</sup> In accordance with [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines \(December 6, 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true, accessed April 9, 2024).

<sup>2</sup> In response to Energy Safety's Rejection and Order to Resubmit for LS Power Grid California, LLC, 2025 Wildfire Mitigation Plan Update, LS Power submitted [LS Power 2025 WMP Update Revision 1 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true); [LS Power 2025 WMP Update Revision 1 \(clean\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57369&shareable=true); [LS Power 2023-2025 Base WMP Revision 3 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57370&shareable=true); and [LS Power 2023-2025 Base WMP Revision 3 \(clean\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57371&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true, accessed Oct. 31, 2024); (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57369&shareable=true, accessed Oct. 31, 2024); (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57370&shareable=true, accessed Oct. 31, 2024); (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57371&shareable=true, accessed Oct. 31, 2024).

<sup>3</sup> [Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan. 2024, published Feb. 2024\) \(hereafter 2025 WMP Update Guidelines\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed May 6, 2024).

<sup>4</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\) \(adopted Jan. 2024, published Feb. 2024\) \(hereafter Revised WMP Process Guidelines\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true, accessed May 6, 2024).

<sup>5</sup> [Rejection and Order to Resubmit for LS Power Grid California, LLC, 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57331&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57331&shareable=true, accessed October 31, 2024).

<sup>6</sup> [LS Power 2025 WMP Update Revision 1 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true); [LS Power 2025 WMP Update Revision 1 \(clean\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57369&shareable=true); [LS Power 2023-2025 Base WMP Revision 3 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57370&shareable=true); and [LS Power 2023-2025 Base WMP Revision 3 \(clean\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57371&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true, accessed Oct. 31, 2024); (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57369&shareable=true, accessed Oct. 31, 2024); (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57370&shareable=true, accessed Oct. 31, 2024); (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57371&shareable=true, accessed Oct. 31, 2024).

## 2.1 Consultation with California Department of Forestry and Fire Protection

The Office of the State Fire Marshal is part of the California Department of Forestry and Fire Protection (CAL FIRE). Public Utilities Code section 8386.3(a) requires Energy Safety to consult with the Office of the State Fire Marshal in reviewing electrical corporations' WMPs and WMP Updates. The Office of the State Fire Marshal provided consultation and input into Energy Safety's evaluation, but this Decision is an action of Energy Safety and not the Office of the State Fire Marshal or CAL FIRE.

## 2.2 Stakeholder Comments

Energy Safety invited stakeholders and members of the public to provide comments on the electrical corporations' 2025 WMP Updates and Revision Notices. Opening comments on LS Power's 2025 WMP Update were due on August 12, 2024, and reply comments were due on August 22, 2024. Energy Safety did not receive any stakeholder comments on LS Power's 2025 WMP Update.

Energy Safety also accepted stakeholder comments on LS Power's resubmitted 2025 WMP Update. Opening comments were due on the resubmitted 2025 WMP Update on September 27, 2024, and reply comments were due October 2, 2024. No comments were received on LS Power's resubmitted 2025 WMP Update.

## 3. Energy Safety 2025 WMP Update Evaluation Process

Energy Safety issued the following guidelines for electrical corporations' 2025 WMP Updates:

- **2025 Wildfire Mitigation Plan Update Guidelines (January 2024)** (hereafter 2025 WMP Update Guidelines), which sets forth reportable updates and general instructions for each electrical corporation's 2025 WMP Update.
- **2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (Revised January 2024)** (hereafter WMP Process Guidelines), which outlines the process for Energy Safety's evaluation of WMPs, details the public participation process, and establishes submission requirements for the electrical corporations.
- **2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model (Revised January 2024)** and **2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey (Revised February 2024)** (hereafter Maturity Model and Maturity Survey), which together provide a quantitative method for assessing electrical corporation wildfire risk mitigation capabilities and examining how electrical corporations continue to improve in key areas of their WMPs.<sup>7, 8</sup>

### 3.1 Reportable Updates

Energy Safety's 2025 WMP Update Guidelines delineate the following five categories of updates that the electrical corporations are required to report:<sup>9</sup>

1. Updates to risk models
2. Updates to approved targets, objectives, and projected expenditures<sup>10</sup>
3. Quarterly inspection targets for 2025 for vegetation management and asset inspections

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<sup>7</sup> [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model \(revised and adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true) (hereafter Maturity Model)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed May 6, 2024).

<sup>8</sup> [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey \(adopted Jan. 2024, revised and published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true) (hereafter Maturity Survey)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true>, accessed May 6, 2024).

<sup>9</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), "Reportable Updates," p. 3

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed May 6, 2024).

<sup>10</sup> Energy Safety's WMP evaluation and decision on a WMP is not an approval of, or agreement with, costs listed in the WMP.



4. New or discontinued programs
5. Progress on areas for continued improvement

The 2025 WMP Update Guidelines state that electrical corporations may not include any updates in their 2025 WMP Update that do not fall under one of these five categories.<sup>11</sup>

The 2025 WMP Update Guidelines further state that if an electrical corporation does not have any updates that fall within any of the above categories, it must affirm that it has no reportable updates for 2025 and that the information provided in its 2023-2025 Base WMP is current and accurate.<sup>12</sup>

## 3.2 Maturity Model and Survey

Energy Safety used the Maturity Model<sup>13</sup> and the electrical corporations' 2023 and 2024 responses to the Maturity Survey<sup>14</sup> to assess the maturity of each electrical corporation's wildfire risk mitigation program.<sup>15</sup>

The Maturity Model consists of 37 individual capabilities describing the ability of electrical corporations to mitigate wildfire risk and Public Safety Power Shutoff (PSPS) risk within their service territory.<sup>16</sup> The 37 capabilities are aggregated into 7 categories.<sup>17</sup> Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). For each electrical corporation, Energy Safety calculated maturity levels for each capability, each category, five

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<sup>11</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed March 29, 2024).

<sup>12</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed March 29, 2024).

<sup>13</sup> [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed May 6, 2024).

<sup>14</sup> [Maturity Survey](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true, accessed May 6, 2024).

<sup>15</sup> Energy Safety revised the 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model and Maturity Survey in January 2024. The revisions did not result in any changes to Maturity Survey questions, therefore the responses from 2024 are directly comparable to the responses from 2023. See the Maturity Survey issued by Energy Safety to the electrical corporations in 2023:

[Revised Final 2023 Electrical Corporation Wildfire Mitigation Maturity Survey \(April 24, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53708&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53708&shareable=true, accessed May 6, 2024).

<sup>16</sup> [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true), Section 1, "Introduction," p. 1 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed April 9, 2024).

<sup>17</sup> [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true), Section 3.1, "Capabilities and Categories," pp. 7-8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed April 9, 2024).

cross-category themes, and the overall WMP, based on the electrical corporation's answers to Maturity Survey questions and the scoring system described in the Maturity Model.<sup>18</sup>

Appendix F summarizes LS Power's 2024 Maturity Survey results and changes in LS Power's maturity compared to its 2023 Maturity Survey results.

### 3.3 Areas for Continued Improvement

Energy Safety's Decisions on the 2023-2025 Base WMPs focused on each electrical corporation's strategies for reducing the risk of utility-related ignitions. In those Decisions, Energy Safety identified areas where the electrical corporation must continue to improve its wildfire mitigation capabilities in future plans. For some areas, the electrical corporation was required to report its progress in its 2025 WMP Update. Energy Safety discusses the results of its evaluation of the electrical corporation's progress in each of those areas in Sections 5 through 9 of this Decision.

### 3.4 Errata

LS Power did not submit an errata and Energy Safety did not request an errata from LS Power.

### 3.5 Revision Notice

Public Utilities Code section 8386.3(a) states, "Before approval, [Energy Safety] may require modifications of the [WMP]." If Energy Safety requires modifications to a WMP, it does so by issuing a Revision Notice to an electrical corporation.<sup>19</sup>

Energy Safety did not issue LS Power a Revision Notice for its 2025 WMP Update.

### 3.6 Decision

In its evaluation of an electrical corporation's 2025 WMP Update, Energy Safety considers the information provided by the electrical corporation regarding its reportable updates and the associated justifications. Energy Safety's approval of a 2025 WMP Update constitutes collective approval of the reported items in the electrical corporation's 2025 WMP Update. The approval therefore authorizes the updates to the electrical corporation's 2023-2025 Base

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<sup>18</sup> [Maturity Model](#), Section 4, "Maturity Level Determination," pp. 39-42 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed April 9, 2024).

<sup>19</sup> [Revised WMP Process Guidelines](#), Section 4.4, "Revision Notice," pp. 6-8 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true>, accessed May 6, 2024).

WMP, as shown in the “Redlined 2023-2025 Base WMP” and “Clean Updated 2023-2025 Base WMP” provided as part of the electrical corporation’s 2025 WMP Update submission.<sup>20</sup>

LS Power’s reported updates reduce risk, increase efficiencies, and demonstrate a commitment to improving situational awareness, forecasting, operational decision-making, and vegetation inspections. Therefore, Energy Safety approves LS Power’s 2025 WMP Update.

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<sup>20</sup> [2025 WMP Update Guidelines](#), pp. 3-4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed March 29, 2024).

## 4. LS Power 2025 WMP Update

In accordance with the 2025 WMP Update Guidelines,<sup>21</sup> LS Power provided the following for its 2025 WMP Update submission:

1. **2025 WMP Update:** A standalone 2025 WMP Update document that describes LS Power's reportable updates, or confirmation of no updates to the approved 2023-2025 Base WMP.
2. **Redlined 2023-2025 Base WMP:** A redlined version of LS Power's 2023-2025 Base WMP showing reportable updates to the approved 2023-2025 Base WMP.
3. **Clean Updated 2023-2025 Base WMP:** A clean, updated copy of LS Power's 2023-2025 Base WMP (i.e., without any updates marked in redline) incorporating the reportable updates from LS Power's 2025 WMP Update as demonstrated in the redlined version.

Specifically, in response to the five categories of reportable updates of the 2025 WMP Update Guidelines, LS Power provided the required information for each category. Energy Safety discusses each reportable update under the relevant mitigation initiative in Sections 5 through 9 of this Decision.

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<sup>21</sup> [2025 WMP Update Guidelines, pp. 3-4](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed May 6, 2024).

## 5. Overview of the Service Territory

In its 2025 WMP Update, LS Power did not report any updates to the overview of the service territory section of its 2023-2025 Base WMP.

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## 6. Risk Methodology and Assessment

In its 2025 WMP Update, LS Power did not report any updates to the risk methodology and assessment section of its 2023-2025 Base WMP.

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## 7. Wildfire Mitigation Strategy Development

In its 2025 WMP Update, LS Power did not report any updates to the wildfire mitigation strategy development section of its 2023-2025 Base WMP.

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## 8. Wildfire Mitigation Initiatives

This section provides Energy Safety’s evaluation of LS Power’s reportable updates related to the following wildfire mitigation initiatives:

- Grid design, operations, and maintenance, including grid design and system hardening, asset inspections, equipment maintenance and repair, and grid operations and procedures
- Vegetation management and inspections
- Situational awareness and forecasting
- Emergency preparedness
- Community outreach and engagement

Energy Safety discusses its evaluation of LS Power’s reportable updates related to PSPS in Section 9. Energy Safety includes discussion of any reportable updates affecting LS Power’s process for continuous improvement in Section 10.

### 8.1 Grid Design, Operations, and Maintenance

In its 2025 WMP Update, LS Power provided three total updates related to the grid design, operations, and maintenance section of its 2023-2025 Base WMP. The updates LS Power provided related to this section included reporting updates to one approved target, reporting updates to one objective, and providing quarterly targets for one asset inspections program.

#### 8.1.1 Grid Design and System Hardening

##### 8.1.1.1 2023 Areas for Continued Improvement

Energy Safety’s Decision on LS Power’s 2023-2025 Base WMP<sup>22</sup> did not require LS Power to report progress on any areas for continued improvement in the grid design and system hardening section in its 2025 WMP Update. Therefore, LS Power has no reportable updates in this area.

##### 8.1.1.2 New or Discontinued Programs

In its 2025 WMP Update, LS Power did not report any new or discontinued programs related to the grid design and system hardening section of its 2023-2025 Base WMP.

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<sup>22</sup> [Energy Safety Decision on LS Power 2023-2025 Base WMP \(January 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true), Section 11 “Required Areas for Continued Improvement,” pp. 54-55 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true, accessed October 31, 2024).



### 8.1.1.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, LS Power did not provide any updates to approved targets, objectives, or projected expenditures related to the grid design and system hardening section of its 2023-2025 Base WMP.

## 8.1.2 Asset Inspections

### 8.1.2.1 2023 Areas for Continued Improvement

Energy Safety's Decision on LS Power's 2023-2025 Base WMP<sup>23</sup> did not require LS Power to report progress on any areas for continued improvement in the asset inspections section in its 2025 WMP Update. Therefore, LS Power has no reportable updates in this area.

### 8.1.2.2 New or Discontinued Programs

In its 2025 WMP Update, LS Power did not report any new or discontinued programs related to the asset inspections section of its 2023-2025 Base WMP.

### 8.1.2.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, LS Power provided quarterly targets (end of Q2 and end of Q3) for one of its 2025 asset inspection programs, as required by the 2025 WMP Update Guidelines.<sup>24</sup>

Additionally, LS Power provided updates to approved targets and objectives related to the asset inspections section of its 2023-2025 Base WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

Specifically, LS Power provided updates to approved targets and objectives for its equipment inspections (LSP-02) initiative. LS Power decreased its target for equipment inspections from 24 to 15.<sup>25</sup> LS Power updated its expected completion date for implementing its substation inspection program from June 2024 to the first quarter of 2025.<sup>26</sup> LS Power stated that the decrease in equipment inspection targets and change in its program implementation date is

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<sup>23</sup> [Energy Safety Decision on LS Power 2023-2025 Base WMP \(January 2024\)](#), Section 11 "Required Areas for Continued Improvement," pp. 54-55 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true>, accessed October 31, 2024).

<sup>24</sup> [2025 WMP Update Guidelines](#), Section 3, "Quarterly Inspection Targets for 2025," p. 15 - (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed April 9, 2023).

<sup>25</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](#), p. 4 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true>, accessed October 25, 2024).

<sup>26</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](#), p. 7 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true>, accessed October 25, 2024).

due to construction and permitting delays which have shifted the energization dates for its Orchard and Fern substations.<sup>27,28</sup> Additionally, LS Power provided quarterly targets for equipment inspections: six inspections for Q2 2025 and nine inspections for Q3 2025.<sup>29</sup>

## Energy Safety Evaluation

Given the energization delays of LS Power's Orchard and Fern substations, Energy Safety finds the decrease in inspection targets and quarterly targets appropriate as the targets correspond to monthly inspections for each substation once energized.

LS Power's quarterly targets for its 2025 asset inspections are consistent with quarterly targets for 2023 and 2024 and meet the requirements of the 2025 WMP Update Guidelines.

## Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for LS Power in asset inspections.

### 8.1.3 Equipment Maintenance and Repair

#### 8.1.3.1 2023 Areas for Continued Improvement

Energy Safety's Decision on LS Power's 2023-2025 Base WMP<sup>30</sup> did not require LS Power to report progress on any areas for continued improvement in the equipment maintenance and repair section in its 2025 WMP Update. Therefore, LS Power has no reportable updates in this area.

#### 8.1.3.2 New or Discontinued Programs

In its 2025 WMP Update, LS Power did not report any new or discontinued programs related to the equipment maintenance and repair section of its 2023-2025 Base WMP.

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<sup>27</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true), p. 4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true, accessed October 25, 2024).

<sup>28</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true), p. 7 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true, accessed October 25, 2024).

<sup>29</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true), p. 9 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true, accessed October 25, 2024).

<sup>30</sup> [Energy Safety Decision on LS Power 2023-2025 Base WMP \(January 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true), Section 11 "Required Areas for Continued Improvement," pp. 54-55 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true, accessed October 31, 2024).

### **8.1.3.3 Targets, Objectives, and Projected Expenditures**

In its 2025 WMP Update, LS Power did not report any updates to approved targets, objectives, or projected expenditures related to the equipment maintenance and repair section of its 2023-2025 Base WMP.

## **8.1.4 Grid Operations and Procedures**

### **8.1.4.1 2023 Areas for Continued Improvement**

Energy Safety's Decision on LS Power's 2023-2025 Base WMP<sup>31</sup> did not require LS Power to report progress on any areas for continued improvement in the grid operations and procedures section in its 2025 WMP Update. Therefore, LS Power has no reportable updates in this area.

### **8.1.4.2 New or Discontinued Programs**

In its 2025 WMP Update, LS Power did not report any new or discontinued programs related to the grid operations and procedures section of its 2023-2025 Base WMP.

### **8.1.4.3 Targets, Objectives, and Projected Expenditures**

In its 2025 WMP Update, LS Power did not report any updates to approved targets, objectives, or projected expenditures related to the grid operations and procedures section of its 2023-2025 Base WMP.

## **8.2 Vegetation Management and Inspections**

In its 2025 WMP Update, LS Power provided three updates related to the vegetation management and inspections section of its 2023-2025 Base WMP. The updates LS Power provided related to this section included reporting an update to one approved target, reporting an update to one objective, and providing quarterly inspection targets for one 2025 vegetation inspection program.

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<sup>31</sup> [Energy Safety Decision on LS Power 2023-2025 Base WMP \(January 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true), Section 11 "Required Areas for Continued Improvement," pp. 54-55 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true, accessed October 31, 2024).

### 8.2.1 2023 Areas for Continued Improvement

Energy Safety's Decision on LS Power's 2023-2025 Base WMP<sup>32</sup> did not require LS Power to report progress on any areas for continued improvement in the vegetation management and inspections section in its 2025 WMP Update. Therefore, LS Power has no reportable updates in this area.

### 8.2.2 New or Discontinued Programs

In its 2025 WMP Update, LS Power did not report any new or discontinued programs related to the vegetation management and inspections section of its 2023-2025 Base WMP.

### 8.2.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, LS Power provided quarterly targets (end of Q2 and end of Q3) for one of its 2025 vegetation management inspection programs, as required by the 2025 WMP Update Guidelines.<sup>33</sup>

Additionally, LS Power provided updates to one approved target and one objective related to the vegetation management and inspections section of its 2023-2025 Base WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

Specifically, LS Power provided an update to its 2025 end-of-year target for vegetation inspections (LSP-04).<sup>34</sup> In its 2023-2025 Base WMP, LS Power stated that vegetation inspections would occur monthly once its facilities were energized; however, LS Power did not define these inspections as a quantitative target.<sup>35</sup> In its 2025 WMP Update, LS Power provided a quantitative target of 15 inspections in 2025: 12 inspections of the Orchard substation, which is expected to energize in January 2025, and 3 inspections of the Fern

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<sup>32</sup> [Energy Safety Decision on LS Power 2023-2025 Base WMP \(January 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true), Section 11 "Required Areas for Continued Improvement," pp. 54-55 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true, accessed October 31, 2024).

<sup>33</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 3 "Quarterly Inspection Targets for 2025," p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed April 9, 2023).

<sup>34</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true), p. 4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true, accessed October 25, 2024).

<sup>35</sup> [LS Power 2023-2025 Base WMP \(R1\) \(February 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56319&shareable=true), p. 121 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56319&shareable=true, accessed November 8, 2024).

substation, which is expected to energize in October 2025.<sup>36</sup> Additionally, LS Power provided quarterly targets for this vegetation inspection program: six inspections by the end of Q2 and nine inspections by the end of Q3.<sup>37</sup>

LS Power also provided an updated objective completion date for implementing its vegetation inspection program (LSP-04) of Q1 2025 (updated from June 2024) due to construction and permitting delays that have pushed the energization dates of its substations into 2025.<sup>38</sup>

### 8.2.3.1 Energy Safety Evaluation

LS Power's quarterly targets for its 2025 vegetation management inspection program are consistent with its approved 2023-2025 Base WMP, which described these inspections as occurring monthly,<sup>39</sup> and meet the requirements of the 2025 WMP Update Guidelines.

LS Power's reported update to the LSP-04 end-of-year target for 2025 adds clarity by defining a specific quantitative target, rather than describing the frequency of inspections in a narrative. This target is also consistent with LS Power's updated timeline for energization of its Orchard and Fern substations.<sup>40</sup> LS Power's reported update to its objective completion date for implementing its vegetation inspection program is also consistent with its updated timeline for energization. As such, Energy Safety finds these updates acceptable.

### 8.2.3.2 Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for LS Power in vegetation management and inspections.

## 8.3 Situational Awareness and Forecasting

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<sup>36</sup> [Data Request OEIS-P-WMP 2024-LSP-01](#), Q01

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57105&shareable=true>, accessed October 25, 2024).

<sup>37</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](#), p. 9

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true>, accessed October 25, 2024).

<sup>38</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](#), p. 7

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true>, accessed October 25, 2024).

<sup>39</sup> [LS Power 2023-2025 Base WMP \(R1\) \(February 2024\)](#), p. 121

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56319&shareable=true>, accessed November 8, 2024).

<sup>40</sup> [Data Request OEIS-P-WMP 2024-LSP-01](#), Q01

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57105&shareable=true>, accessed October 25, 2024).

In its 2025 WMP Update, LS Power provided five total updates related to the situational awareness and forecasting section of its 2023-2025 Base WMP. The updates LS Power provided related to this section included reporting one new program and reporting updates to two approved targets and two objectives.

### **8.3.1 2023 Areas for Continued Improvement**

Energy Safety's Decision on LS Power's 2023-2025 Base WMP<sup>41</sup> did not require LS Power to report progress on any areas for continued improvement in the situational awareness and forecasting section in its 2025 WMP Update. Therefore, LS Power has no reportable updates in this area.

### **8.3.2 New or Discontinued Programs**

In its 2025 WMP Update, LS Power reported creating one new program related to the situational awareness and forecasting section of its 2023-2025 Base WMP. Energy Safety finds that this update meets the reportable update criteria set forth in the 2025 WMP Update Guidelines.

LS Power stated that it will install dedicated onsite weather stations at each of its substation facilities.<sup>42</sup>

#### **8.3.2.1 Energy Safety Evaluation**

In response to LS Power's reported new program, as summarized above, Energy Safety finds that LS Power will gain greater situational awareness and increased real-time data collection with the installation of these new weather stations located at each of its substations.

#### **8.3.2.2 Areas for Continued Improvement**

Energy Safety has no new areas for continued improvement for LS Power in situational awareness and forecasting.

### **8.3.3 Targets, Objectives, and Projected Expenditures**

In its 2025 WMP Update, LS Power provided updates to two approved targets and two objectives related to the situational awareness and forecasting section of its 2023-2025 Base

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<sup>41</sup> [Energy Safety Decision on LS Power 2023-2025 Base WMP \(January 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true), Section 11 "Required Areas for Continued Improvement," pp. 54-55 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true, accessed October 31, 2024).

<sup>42</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true), p. 10 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true, accessed October 25, 2024).

WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

Specifically, LS Power provided updates to approved targets for initiatives LSP-05 (integration of StormGeo, a weather forecasting support tool) and LSP-06 (installation of cameras at Orchard/Fern Road).<sup>43</sup> LS Power reported updates to its target for LSP-05 from 0% to 100% integration in 2025.<sup>44</sup> LS Power also reported updates to its target for LSP-06 from 0 to 32 cameras installed in 2025.<sup>45</sup>

Additionally, LS Power reported updates to two objectives, extending completion dates for integrating StormGeo (LSP-05) from December 2024 to Q1 2025, and installing cameras at its substations (LSP-06) from December 2024 to Q4 2025.<sup>46</sup>

LS Power stated that its updates to these initiatives are due to construction and permitting delays which have pushed energization dates for both Orchard and Fern substations into 2025.<sup>47</sup>

### **8.3.3.1 Energy Safety Evaluation**

Energy Safety finds that the integration of StormGeo and the installation of multiple monitoring cameras into LS Power's operation will increase its ability to have greater weather forecasting data and increased situational awareness. This increase in real-time data collection will help guide LS Power's operational decision-making, provide alerts for equipment malfunctions, and will likely result in a decrease in fire risk.

### **8.3.3.2 Areas for Continued Improvement**

Energy Safety has no new areas for continued improvement for LS Power in situational awareness and forecasting.

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<sup>43</sup> [LS Power 2023-2025 Base WMP \(R3\) \(clean version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57371&shareable=true), p. 129

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57371&shareable=true>, accessed October 31, 2024).

<sup>44</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true), p. 4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true>, accessed October 25, 2024).

<sup>45</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true), p. 5

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true>, accessed October 25, 2024).

<sup>46</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true), p. 7

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true>, accessed October 25, 2024).

## 8.4 Emergency Preparedness

In its 2025 WMP Update, LS Power provided three total updates related to the emergency preparedness section of its 2023-2025 Base WMP. The updates LS Power provided related to this section included reporting required progress on one area for continued improvement and reporting updates to two objectives.

### 8.4.1 2023 Areas for Continued Improvement

LS Power reported its progress on one area for continued improvement in the emergency preparedness section in its 2025 WMP Update.

#### 8.4.1.1 LS Power-23B-01. Emergency Preparedness Tables<sup>48</sup>

In its 2023 WMP Decision, Energy Safety found that many of LS Power's emergency preparedness tables were incomplete.<sup>49</sup> Energy Safety required LS Power to complete all 20 tables in the emergency preparedness section (WMP Tables 8-33 through 8-52).<sup>50</sup>

In its Redlined 2023-2025 Base WMP,<sup>51</sup> LS Power updated the applicable tables and in its 2025 WMP Update identified those table updates.<sup>52</sup>

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<sup>48</sup> Energy Safety is instituting a new naming convention for its areas for continued improvement. Moving forward, areas for continued improvement identified in Energy Safety's evaluation of Base WMPs will be designated with a "B" and areas for continued improvement identified in Energy Safety's evaluation of WMP Updates will be designated with a "U." Accordingly, areas for continued improvement that were identified in Energy Safety's evaluation of 2023-2025 Base WMPs are retitled "23B" and new areas for continued improvement identified in Energy Safety's evaluation of 2025 Update WMPs herein are titled "25U."

<sup>49</sup> [Energy Safety Decision on LS Power 2023-2025 Base WMP \(January 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true), Section 11 "Required Areas for Continued Improvement," pp. 54-55 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true, accessed October 31, 2024).

<sup>50</sup> [Energy Safety Decision on LS Power 2023-2025 Base WMP \(January 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true), Section 11 "Required Areas for Continued Improvement," pp. 54-55 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true, accessed October 31, 2024).

<sup>51</sup> [LS Power 2023-2025 Base WMP \(R3\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57370&shareable=true), Section 8.4 "Emergency Preparedness" (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57370&shareable=true, accessed October 31, 2024).

<sup>52</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true), pp. 11-19 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true, accessed October 25, 2024).



## Energy Safety Evaluation

As stated above, LS Power updated its emergency preparedness tables in response to this area for continued improvement and provided more complete information in its 2023-2025 Base WMP.

LS Power sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in LS Power's 2026-2028 Base WMP.

### 8.4.2 New or Discontinued Programs

In its 2025 WMP Update, LS Power did not report any new or discontinued programs related to the emergency preparedness section of its 2023-2025 Base WMP.

### 8.4.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, LS Power provided updates to two objectives related to the emergency preparedness section of its 2023-2025 Base WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

Specifically, LS Power provided updates to objective completion dates for its initiatives to establish contact with local public safety and fire agencies (LSP-09) and ensure site locations and access information are integrated into relevant dispatch systems (LSP-08). Both objective completion dates were updated from June 2024 to January 2025.<sup>53</sup> LS Power stated that its objective completion date changes are due to delays with its energization dates, with its first substation becoming operational in January 2025.<sup>54</sup> LS Power also stated that it will need to provide its dispatchers with updated operational contacts and safety information prior to energization.<sup>55</sup>

#### 8.4.3.1 Energy Safety Evaluation

Energy Safety finds that given the energization delays of LS Power's Orchard and Fern substations, it is appropriate for LS Power to establish contact with public safety and fire agencies, as well as provide location and access information to dispatchers, ahead of its new energization dates in 2025. While Energy Safety recognizes that these delays give LS Power

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<sup>53</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true), p. 8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true, accessed October 25, 2024).

<sup>54</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true), p. 8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true, accessed October 25, 2024).

<sup>55</sup> [LS Power 2025 WMP Update \(R1\) \(redline version, September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true), p. 8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true, accessed October 25, 2024).

more time to connect with local public safety entities, it is important that LS Power establishes contact prior to energizing its substations.

#### **8.4.3.2 Areas for Continued Improvement**

Energy Safety has no new areas for continued improvement for LS Power in emergency preparedness.

## **8.5 Community Outreach and Engagement**

In its 2025 WMP Update, LS Power did not report any updates to the community outreach and engagement section of its 2023-2025 Base WMP.

DRAFT

## 9. Public Safety Power Shutoff

In its 2025 WMP Update, LS Power did not report any updates to the Public Safety Power Shutoff section of its 2023-2025 Base WMP.

DRAFT

## 10. LS Power's Process for Continuous Improvement

LS Power did not indicate any changes to the lessons learned or corrective action program sections of its 2023-2025 Base WMP.

DRAFT

# 11. Required Areas for Continued Improvement

Energy Safety’s Decision on LS Power’s 2023-2025 Base WMP<sup>56</sup> required LS Power to report progress on one area for continued improvement in its 2025 WMP Update. LS Power responded by completing the tables in the emergency preparedness section of its Redlined 2023-2025 Base WMP, meeting Energy Safety’s required progress. Energy Safety’s Decision on LS Power’s 2023-2025 Base WMP did not require LS Power to report progress on any areas for continued improvement in its 2026-2028 Base WMP. In its evaluation of LS Power’s 2025 WMP Update, Energy Safety did not identify any new areas for continued improvement for LS Power. Therefore, LS Power is not required to report on any areas for continued improvement in its 2026-2028 Base WMP.

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<sup>56</sup> [Energy Safety Decision on LS Power 2023-2025 Base WMP \(January 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true), Section 11 “Required Areas for Continued Improvement,” pp. 54-55 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true, accessed October 31, 2024).

## 12. Conclusion

LS Power's 2025 WMP Update is approved.

Catastrophic wildfires remain a serious threat to the health and safety of Californians. Electrical corporations, including LS Power, must continue to make progress toward reducing utility-related ignition risk.

Energy Safety expects LS Power to effectively implement its wildfire mitigation activities to reduce the risk of utility-related ignitions and the potential catastrophic consequences if an ignition occurs, as well as to reduce the scale, scope, and frequency of PSPS events.

LS Power must meet the commitments in its WMP to ensure it meaningfully reduces utility-related ignition and PSPS risk within its service territory over the plan cycle.

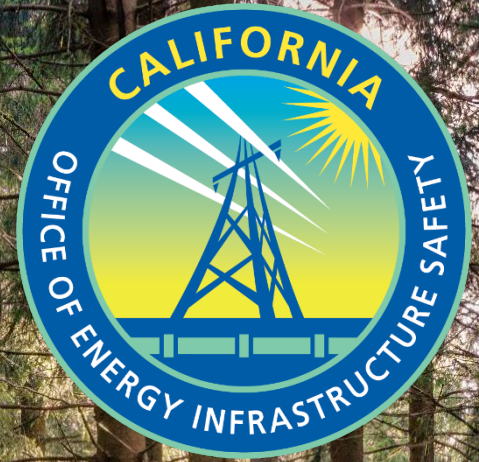
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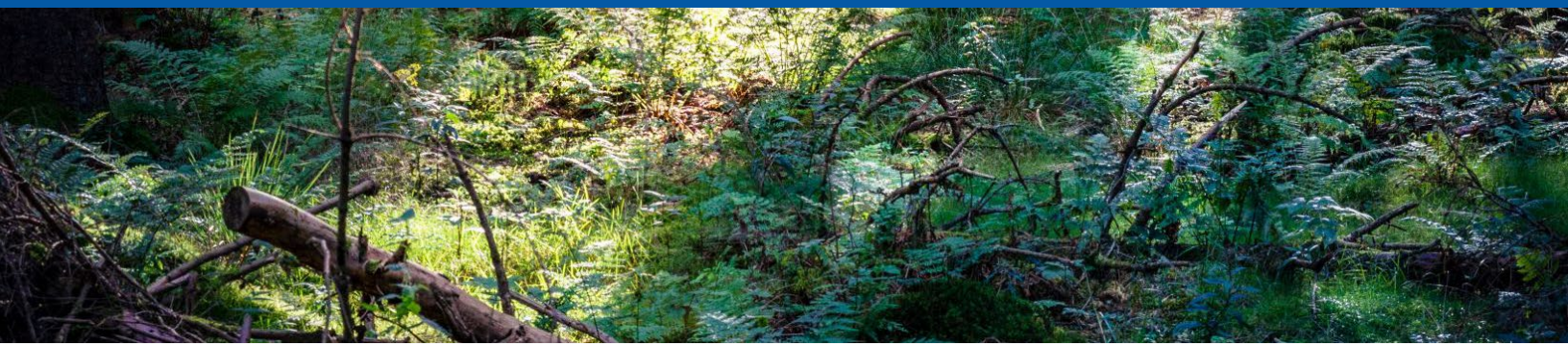


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# APPENDICES





## APPENDICES

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# Appendix A.

## Glossary of Terms

Term	Definition
<b>AFN</b>	Access and functional needs
<b>BVES</b>	Bear Valley Electric Service
<b>CAISO</b>	California Independent System Operator
<b>Cal Advocates</b>	The Public Advocates Office at the California Public Utilities Commission
<b>CAL FIRE</b>	California Department of Forestry and Fire Protection
<b>Cal OES</b>	California Governor's Office of Emergency Services
<b>CAP</b>	Corrective action program
<b>CBO</b>	Community-based organization
<b>CDFW</b>	California Department of Fish and Wildlife
<b>CEC</b>	California Energy Commission
<b>CEJA</b>	California Environmental Justice Alliance
<b>CNRA</b>	California Natural Resources Agency
<b>CPUC</b>	California Public Utilities Commission
<b>D.</b>	Prefix to a proceeding number designating a CPUC decision
<b>DR</b>	Data request
<b>DWR</b>	California Department of Water Resources
<b>EBMUD</b>	East Bay Municipal Utility District
<b>EFD</b>	Early fault detection

<b>Term</b>	<b>Definition</b>
<b>EPUC</b>	Energy Producers and Users Coalition
<b>EVM</b>	Enhanced vegetation management
<b>FERC</b>	Federal Energy Regulatory Commission
<b>FPI</b>	Fire potential index
<b>FWI</b>	Fire weather index
<b>GFN</b>	Ground-fault neutralizers
<b>GIS</b>	Geographic information systems
<b>GO</b>	General order
<b>GPI</b>	Green Power Institute
<b>GRC</b>	General rate case
<b>HD</b>	High definition
<b>HFRA</b>	High Fire Risk Area
<b>HFTD</b>	High fire threat district
<b>HWT or Horizon West</b>	Horizon West Transmission
<b>I.</b>	Prefix to a proceeding number designating a CPUC Order Instituting Investigation (OII)
<b>ICS</b>	Incident command system or structure
<b>IOU</b>	Investor-owned utility
<b>IR</b>	Infrared
<b>ISA</b>	International Society of Arboriculture
<b>ITO</b>	Independent transmission owner
<b>kV</b>	Kilovolt

<b>Term</b>	<b>Definition</b>
<b>Liberty</b>	Liberty Utilities
<b>LiDAR</b>	Light detection and ranging
<b>Maturity Model</b>	Electrical Corporation Wildfire Mitigation Maturity Model
<b>Maturity Survey</b>	Electrical Corporation Wildfire Mitigation Maturity Survey
<b>MAVF</b>	Multi-attribute value function
<b>MBL</b>	Medical Baseline
<b>MGRA</b>	Mussey Grade Road Alliance
<b>ML</b>	Machine learning
<b>NDVI</b>	Normalized difference vegetation index
<b>NERC</b>	North American Electric Reliability Corporation
<b>NFDRS</b>	National Fire Danger Rating System
<b>NOD</b>	Notice of defect
<b>NOV</b>	Notice of violation
<b>OCM</b>	Overhead circuit miles
<b>OEIS or Energy Safety</b>	Office of Energy Infrastructure Safety
<b>PG&amp;E</b>	Pacific Gas and Electric Company
<b>PoF</b>	Probability of failure
<b>PoI</b>	Probability of ignition
<b>PRC</b>	Public Resources Code
<b>PSPS</b>	Public Safety Power Shutoff

Term	Definition
<b>Pub. Util. Code or PU Code</b>	Public Utilities Code
<b>QA</b>	Quality assurance
<b>QC</b>	Quality control
<b>QDR</b>	Quarterly Data Report
<b>R.</b>	Prefix to a proceeding number designating a CPUC rulemaking
<b>RAMP</b>	Risk Assessment and Mitigation Phase
<b>RCRC</b>	Rural County Representatives of California
<b>REFCL</b>	Rapid earth fault current limiter
<b>RFW</b>	Red Flag Warning
<b>RSE</b>	Risk-spend efficiency
<b>SAWTI</b>	Santa Ana Wildfire Threat Index
<b>SCADA</b>	Supervisory control and data acquisition
<b>SCE</b>	Southern California Edison Company
<b>SDG&amp;E</b>	San Diego Gas & Electric Company
<b>S-MAP</b>	Safety Model Assessment Proceeding, now the Risk-Based Decision-Making Framework Proceeding
<b>SMJU</b>	Small and multijurisdictional utilities
<b>TAT</b>	Tree Assessment Tool
<b>TBC</b>	Trans Bay Cable
<b>TURN</b>	The Utility Reform Network
<b>USFS</b>	United States Forest Service
<b>VM</b>	Vegetation management

Term	Definition
<b>VRI</b>	Vegetation risk index
<b>WMP</b>	Wildfire Mitigation Plan
<b>WRRM</b>	Wildfire Risk Reduction Model
<b>WSAB</b>	Wildfire Safety Advisory Board
<b>WUI</b>	Wildland-urban interface

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## Appendix B.

# Status of 2023 Areas for Continued Improvement

Energy Safety’s 2023 Decision<sup>1</sup> for LS Power identified areas for continued improvement and associated required progress. Areas for continued improvement are where LS Power must continue to improve its wildfire mitigation capabilities. As part of the 2025 WMP Update evaluation process, Energy Safety reviewed the progress reported by LS Power on areas for continued improvement that Energy Safety required progress on by the 2025 WMP Update. Energy Safety is satisfied that LS Power has made sufficient progress in all the identified areas for continued improvement.

LS Power’s 2023 areas for continued improvement that Energy Safety required progress on by the 2025 WMP Update are listed in Table A-1. The status column indicates whether each has been fully addressed. If not, the column notes where to find more information in this Decision.

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<sup>1</sup> [Energy Safety Decision on LS Power 2023-2025 Base WMP \(January 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true), Section 11 “Required Areas for Continued Improvement,” pp. 54-55 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true, accessed October 31, 2024).

Table A-1. LS Power 2023 Areas for Continued Improvement

ID	Title	Status
<b>LS Power-23B-01</b> <b>(LS Power-23-01)</b>	Emergency Preparedness Tables	LS Power sufficiently addressed the required progress.

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# **Appendix C. Stakeholder Data Request Responses Used in WMP Evaluation**

No stakeholder data request responses were cited in this Decision.

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# Appendix D.

## Stakeholder Comments on the 2025 WMP Updates

Energy Safety invited stakeholders, including members of the public, to provide comments on the electrical corporations' 2025 WMP Updates. Opening comments on Group 2 WMPs were due on August 12, 2024, and reply comments were due on August 22, 2024. Comments received on the 2025 WMP Updates can be viewed in the 2023-2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log.

Energy Safety did not receive any stakeholder comments on LS Power's 2025 WMP Update.

Energy Safety invited stakeholders, including members of the public, to provide comments on LS Power's resubmitted 2025 WMP Update (Revision 1)<sup>2</sup> as a result of Energy Safety's Rejection and Order to Resubmit.<sup>3</sup> Opening comments were due on September 27, 2024, and reply comments were due October 2, 2024.

No comments were received on LS Power's resubmitted 2025 WMP Update.

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<sup>2</sup> [LS Power 2025 WMP Update Revision 1 \(redlined\)](#); [LS Power 2025 WMP Update Revision 1 \(clean\)](#); [LS Power 2023-2025 Base WMP Revision 3 \(redlined\)](#); and [LS Power 2023-2025 Base WMP Revision 3 \(clean\)](#) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57368&shareable=true>, accessed Oct. 31, 2024); (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57369&shareable=true>, accessed Oct. 31, 2024); (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57370&shareable=true>, accessed Oct. 31, 2024); (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57371&shareable=true>, accessed Oct. 31, 2024).

<sup>3</sup> [Rejection and Order to Resubmit for LS Power Grid California, LLC, 2025 Wildfire Mitigation Plan Update](#) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57331&shareable=true>, accessed October 31, 2024).

# Appendix E.

## Stakeholder Comments on the Draft Decision

This appendix will contain Energy Safety's summary of stakeholder comments on Energy Safety's draft Decision on LS Power's 2025 WMP Update.

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# Appendix F.

## Maturity Survey Results

Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model<sup>4</sup> (Maturity Model) and Electrical Corporation Wildfire Mitigation Maturity Survey<sup>5</sup> (Maturity Survey) together provided a quantitative method to assess the maturity of each electrical corporation's wildfire risk mitigation program.

The Maturity Model consists of 37 individual capabilities describing the ability of electrical corporations to mitigate wildfire risk within their service territory. The 37 capabilities are aggregated into seven categories. The seven mitigation categories are:

- A. Risk Assessment and Mitigation Selection
- B. Situational Awareness and Forecasting
- C. Grid Design, Inspections, and Maintenance
- D. Vegetation Management and Inspections
- E. Grid Operations and Protocols
- F. Emergency Preparedness
- G. Community Outreach and Engagement

Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). Electrical corporations' responses to the Maturity Survey, listed by mitigation category, are depicted in the figures and tables below.

Figure A-1 displays LS Power's 2024 response to the Maturity Survey across mitigation categories showing minimum and average values. Figure A-2 compares LS Power's 2024 response to the Maturity Survey to its 2023 response to the Maturity Survey, depicting values that increased, decreased, or had no change (indicated by "NC").

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<sup>4</sup> [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model \(revised and adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed May 6, 2024).

<sup>5</sup> [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey \(adopted Jan. 2024, revised and published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true>, accessed May 6, 2024).

Figure A-1. LS Power 2024 Response to the 2023-2025 Maturity Survey

		1. Capability				2. Capability				3. Capability				4. Capability				5. Capability				6. Capability			
		2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026
A. Risk Assessment and Mitigation Strategy		1. Statistical weather, climate, and wildfire modeling				2. Calculation of wildfire and PSPS risk exposure for societal values				3. Calculation of community vulnerability to wildfire and Public Safety Power Shutoffs (PSPS)				4. Calculation of risk and risk components				5. Risk event tracking and integration of lessons learned				6. Risk-informed wildfire mitigation strategy			
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Average of Sub-Cap.	0.2	1.0	1.0	1.0	0.6	1.1	1.1	1.1	0.5	0.5	0.5	0.5	0.0	0.7	0.7	0.7	1.0	1.0	2.0	2.3	0.6	0.6	0.6	0.6
B. Situational Awareness and Forecasting		7. Ignition likelihood estimation				8. Weather forecasting ability				9. Wildfire spread forecasting				10. Data collection for near-real-time conditions				11. Wildfire detection and alarm systems				12. Centralized monitoring of real-time conditions			
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	0.0	0.0	0.0	0.0
	Average of Sub-Cap.	0.4	0.4	0.4	0.4	0.1	0.5	0.5	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.6	0.0	0.0	2.2	2.2	0.0	0.4	2.0	2.0
C. Grid Design, Inspections, and Maintenance		13. Asset inventory and condition database				14. Asset inspections				15. Asset maintenance and repair				16. Grid design and resiliency				17. Asset and grid personnel training and quality							
	Minimum of Sub-Cap.	0.0	0.0	2.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0				
	Average of Sub-Cap.	1.0	1.0	2.5	2.5	0.0	0.0	1.0	1.0	0.0	0.0	1.0	1.0	0.2	0.2	0.2	0.2	0.3	1.0	2.0	2.0				
D. Vegetation Management and Inspections		18. Vegetation inventory and condition database				19. Vegetation inspections				20. Vegetation treatment				21. Vegetation personnel training and quality											
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0								
	Average of Sub-Cap.	2.0	2.0	2.0	2.0	0.0	0.0	1.3	1.3	0.3	0.3	1.0	1.0	0.0	0.0	0.8	0.8								
E. Grid Operations and Protocols		22. Protective equipment and device settings				23. Incorporation of ignition risk factors in grid control				24. PSPS operating model				25. Protocols for PSPS re-energization				26. Ignition prevention and suppression							
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.0	2.0				
	Average of Sub-Cap.	1.2	1.2	1.3	1.3	0.0	0.0	0.0	0.0	0.7	0.7	0.7	0.7	1.5	1.5	2.2	2.2	0.0	1.3	2.0	2.0				
F. Emergency Preparedness		27. Wildfire and PSPS emergency and disaster preparedness plan				28. Collaboration and coordination with public safety partners				29. Public emergency communication strategy				30. Preparedness and planning for service restoration				31. Customer support in wildfire and PSPS emergencies				32. Learning after wildfires and PSPS incidents			
	Minimum of Sub-Cap.	0.0	0.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Average of Sub-Cap.	0.0	0.8	1.0	1.5	0.0	0.0	0.5	0.5	0.7	0.7	0.7	0.7	0.8	0.8	1.3	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
G. Community Outreach and Engagement		33. Public outreach and education awareness				34. Public engagement in electrical corporation wildfire mitigation planning				35. Engagement with AFN and socially vulnerable populations				36. Collaboration on local wildfire mitigation planning				37. Cooperation and best practice sharing with other electrical corporations							
	Minimum of Sub-Cap.	0.0	0.0	1.0	1.0	0.0	0.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	0.0	0.0	0.0	1.0				
	Average of Sub-Cap.	0.0	0.0	2.5	2.5	0.0	0.0	2.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0	2.0	2.0	0.0	0.0	0.0	1.3				

