



January 17, 2025

To: Stakeholders for the Wildfire Mitigation Plans, Executive Compensation, Safety Cultural Assessments, and Safety Certification workstreams

Subject: Draft Energy Safety Policy Division Process Guidelines

Pursuant to Government Code section 15474.6, the Office of Energy Infrastructure Safety (Energy Safety) hereby releases for public comment the draft Energy Safety Policy Division Process Guidelines. These guidelines establish requirements for procedures (e.g., extension requests, docket access, errata, naming conventions, and data requests) within the Electrical Safety Policy Division, covering processes associated with electrical corporations' Wildfire Mitigation Plans, Safety Culture Assessments, Safety Certifications, and Executive Compensation Structures. These guidelines shall be effective upon their adoption.

Public Comment

Energy Safety herein provides the draft Energy Safety Policy Division Process Guidelines for public review and comment.

Opening comments will be accepted through February 6, 2025, 5:00 p.m. Reply comments will be accepted through February 18, 2025, 5:00 p.m.

Comments must be submitted to the Wildfire Mitigation Plan Guidelines docket (#WMP-Guidelines)¹ and titled "[Commenter Name] [Opening/Reply] comments on the Policy Division Process Guidelines."

To receive notifications of the comments on these documents, subscribe to Energy Safety's WMPs service list by following the instructions at:

<https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/>.

Adoption Meeting

Pursuant to Government Code section 15475.6, Energy Safety will hold a public meeting to adopt the guidelines and will provide an opportunity for the public and stakeholders to

¹ [Docket #WMP-Guidelines \(ca.gov\)](https://energysafety.ca.gov/)

(<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=WMP-Guidelines>, accessed October 8, 2024).

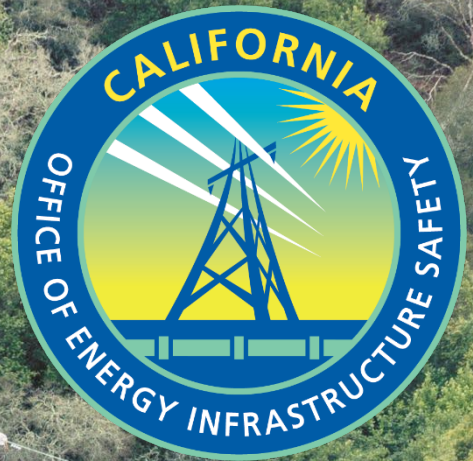
comment on the guidelines during that meeting. Energy Safety will hold this public meeting at a later date and will provide at least 10-days' notice.

Sincerely,

/s/ Tony Marino

Tony Marino

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



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

DRAFT ENERGY SAFETY POLICY DIVISION

PROCESS GUIDELINES

Version 1.0

January 2025

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1 Introduction

This document establishes guidelines¹ outlining the process requirements for Electrical Safety Policy Division (ESPD) submissions for each of its workstreams, including executive compensation, safety certifications, safety culture assessments, Wildfire Mitigation Plans (WMPs),² and Public Utilities Code section 326(a)(7). For specified workstreams below,³ these guidelines will become effective beginning with the listed submissions and remain in effect until superseded:

- 2024 Safety Culture Assessments
- 2025 Executive Compensation
- 2025 Safety Certifications
- 2026-2028 Base WMPs

Additional process requirements specific to a workstream are set forth in workstream-specific guidelines.

2 Schedule

Energy Safety may issue schedules establishing or revising deadlines for any submission. For WMP submissions, Energy Safety will release a schedule each year prior to the pre-submission or submission⁴ deadline.

Any deadline that falls on a Saturday, Sunday, holiday, or any other day when Energy Safety offices are closed shall be moved to the following business day. A document will be accepted by Energy Safety as of the date of the document's receipt. Documents submitted after 5:00 p.m. Pacific Time⁵ on a business day, or at any time on a Saturday, Sunday, holiday, or any other day when Energy Safety offices are closed shall be deemed received the next business day.

¹ Gov. Code, § 15475.6.

² Unless otherwise specified, "WMP" refers to both Base WMP and WMP Update submissions.

³ For Public Utilities Code section 326(a)(7) obligations, these guidelines shall be effective upon adoption.

⁴ Prior to the submission if there is no pre-submission required.

⁵ All time references hereinafter are to Pacific Time Zone.

3 Extension Requests

Any person or entity seeking an extension to a deadline for a submission must email a request for extension to SafetyPolicy@energysafety.ca.gov, and when applicable, the assigned Energy Safety staff lead. The request must include:

- Original deadline,
- Type of submission,
- Good cause for the extension request, and
- Proposed revised deadline.

Extension requests must be received by Energy Safety by 5:00 p.m. at least two business days prior to the original due date.

For any technical issues encountered that may affect the timeliness of a submission, a person or entity must immediately contact SafetyPolicy@energysafety.ca.gov, and, when applicable, the assigned Energy Safety staff lead.

4 Public Participation

4.1 Docket Access

Energy Safety uses a docket system to publish public documents and a service list system to notify the public of documents being added to dockets. Energy Safety dockets can be viewed at: <https://efiling.energysafety.ca.gov/>

There is a separate case for each major ESPD workstream or deliverable. Within each case, there are several dockets organized by document type or year. The public can view each docket's log to see files, reports, and data filed in that docket.

The public may subscribe to a case's service list. Subscribers to a service list will be auto-notified each time a new file is added to the dockets within that case. Additional information on Energy Safety's service lists and detailed instructions for signing up can be found at <https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/>.

4.2 Public Comments

Members of the public, including regulated electrical corporations and stakeholders, may submit public comments to Energy Safety for workstreams described in these guidelines. Comments must be submitted in accordance with the requirements herein and schedules established by Energy Safety. Schedules may include information such as: subject and type of public comment (e.g., opening or reply comments) accepted, deadlines, and page limits.

The scope of opening comments must focus on information contained in the document that is available for public comment. The scope of reply comments is limited to the issues raised in opening comments. New information in reply comments that is not directly related to issues presented in opening comments will not be considered.

While Energy Safety does not respond to public comments directly, it considers all comments before issuing a decision. When a comment is received, it becomes public record and will be available to the public on the Energy Safety docket. Energy Safety will publish the comments as received without redaction of personal information. Energy Safety may reject comments that do not comply with the requirements of these guidelines and the applicable schedule.

4.3 Submitting Comments

Public comments must conform to the following requirements:

- Whenever possible, comments must be submitted electronically to the proper docket on Energy Safety’s e-filing system.⁶ For example, for comments related to WMP matters, comments must be submitted to the appropriate year’s WMP docket (e.g., #2023-2025-WMPs).
- Comments submitted through e-filing from an electrical corporation or stakeholder must include the person or entity’s name followed by “Opening Comments” or “Reply Comments” and then the relevant abbreviations set forth in Table 1 in Section 8.1. For example:
 - Opening comments on the initial version of Pacific Gas and Electric Company (PG&E) 2023-2025 Base WMP Submission:
“ORNAME⁷_OpeningComments_PGE_2023-2025_Base-WMP_R0.”
 - Reply comments on the initial version of San Diego Gas and Electric (SDG&E) 2023 Executive Compensation Structure Submission:
“ORNAME_ReplyComments_SDGE_2023_ECSS_R0”
- Submissions through the Office’s e-filing system must be accessible.⁸
- The submission process for confidential information is set forth in section 29200 of Title 14 of the California Code of Regulations.

⁶ While electronic submissions via e-filing are encouraged, Energy Safety will accept mailed or in-person submissions at, 715 P Street, 15th Floor, Sacramento, California 95814.

⁷ For comments submitted by an individual, an individual may use their last name in place of the organization name.

⁸ For more information, please see the State of California’s [Accessibility Standards](https://webstandards.ca.gov/accessibility/) (https://webstandards.ca.gov/accessibility/) including compliance with [Web Content Accessibility Guidelines \(WCAG\) 2.2](https://www.w3.org/TR/WCAG22/) (https://www.w3.org/TR/WCAG22/), Level AA.

4.4 Workshops

Energy Safety may hold public workshops on designated topics. All Energy Safety workshops and corresponding agendas will be noticed to the applicable docket and service lists.

5 Data Requests from Energy Safety

Energy Safety may obtain any information that is relevant to a matter within the scope of its authority from an electrical corporation via a data request.

The following applies to data requests:

1. Data requests from Energy Safety staff to an electrical corporation may come from SafetyPolicy@energysafety.ca.gov or from individual Energy Safety staff e-mail addresses. All responses to Energy Safety data requests must be submitted to the appropriate year's data request docket (e.g., #2023-2025-WMP-DRs). An electrical corporation must submit one file per data request to the docket (as opposed to a file for every question in the data request).
2. For data requests issued by 5:00 p.m. on a business day, the date of issuance is Day 0. For data requests issued after 5:00 p.m. or on a Saturday, Sunday, holiday, or any other day when Energy Safety offices are closed, the next business day is Day 0.
3. Unless a different response period is provided by Energy Safety, an electrical corporation must respond to all data requests by 5:00 p.m., on Day 10, with each business day counted as one day. For example, with no holidays in between, if a data request is submitted at 2:00 pm on a Monday, the data request response would be due by 5:00 pm on the Monday two weeks after.
4. Extension Requests
 - a. If an electrical corporation seeks a longer response period than as provided in this section or as provided by Energy Safety, the electrical corporation must request an extension by sending an extension request to SafetyPolicy@energysafety.ca.gov and, if known, to the assigned Energy Safety staff lead for the electrical corporation's workstream.
 - b. An extension request must include:
 - i. The data request or portion of the data request requiring an extension;
 - ii. Good cause for the extension; and
 - iii. A proposed date of response in lieu of the original deadline.
 - c. Any extension request must be received by Energy Safety by 5:00 p.m. one business day prior to the original data request response due date.

5.1 Data Requests During the WMP Review Period

Unless a different response period is provided by Energy Safety, during the WMP review period, an electrical corporation must respond to all WMP-related data requests by 5:00 p.m. on Day 3, with each business day counted as one day. For example, in a week with no holidays, if a data request is submitted at 2:00 p.m. on a Monday, the data request response would be due by 5:00 p.m. on Thursday of that same week.

The three-business-day response requirement for WMP-related data requests is only in effect during the review period. For purpose of a data request from Energy Safety, the WMP review period for an electrical corporation begins on the date of the pre-submission check submission or the date of the WMP submission, whichever is earlier, and lasts until Energy Safety issues its Decision for the electrical corporation.

6 Data Requests from Stakeholders

A Data Request Stakeholder, as defined in Section 6.1, may obtain through a data request to electrical corporations, information as related to any docket matter that seeks public comments.

Prior to issuing a data request, a person or entity must seek and obtain designation as a Data Request Stakeholder pursuant to Section 6.1. A person or entity may submit public comments without designation as a Data Request Stakeholder.

6.1 Data Request Stakeholder Designation

Any person or entity must submit a request for and receive designation as a Data Request Stakeholder for a docket matter to send data requests to electrical corporations regarding the submissions of electrical corporations for that docket matter. An initial request for designation as a Data Request Stakeholder can be submitted any time prior to a submission but must be submitted to the relevant docket no later than five business days following a submission deadline from an electrical corporation.

A request for designation as a Data Request Stakeholder must include:

1. The docket matter (Docket #) the person or entity intends to participate in (e.g., #2023-2025-WMPs),
2. The position and interest of the person in the docket matter,
3. Disclosure of the persons or entities on whose behalf the person may be seeking the designation, if any,
4. The electrical corporations for which the person or entity seeks stakeholder status. This may include a request for all electrical corporations, and

5. The name, mailing address, e-mail address, and telephone number of the person or entity designee.

A request for designation as a Data Request Stakeholder will be considered approved five business days after submission without any further correspondence from Energy Safety unless the person or entity seeking the designation is otherwise notified by Energy Safety during that time. Once granted designation as a Data Request Stakeholder for a docket matter, a person or entity shall retain that designation until withdrawn by Energy Safety. The designation is automatically withdrawn after three years of non-participation in the docket matter. After the withdrawal of a designation, the person or entity must resubmit for status as a Data Request Stakeholder for future submissions.

Energy Safety may grant late requests for designation as a Data Request Stakeholder only on a showing of good cause by the interested person or entity.

6.2 Data Request Process for Data Request Stakeholders

The following applies to data requests from Data Request Stakeholders:

1. An electrical corporation must respond to all data requests within ten business days of the request, unless a different response period is mutually agreed upon by the Data Request Stakeholder making the data request and the electrical corporation.
2. Extension Requests
 - a. Prior to seeking an extension from Energy Safety to respond to a data request, an electrical corporation must first make a good-faith effort to ask the Data Request Stakeholder making the request to agree to the extension.
 - b. If an electrical corporation cannot reach an agreement with the Data Request Stakeholder making the request, the electrical corporation must request an extension by sending an extension request to SafetyPolicy@energysafety.ca.gov and, if known, to the assigned Energy Safety staff lead for the electrical corporation's workstream.
 - c. An extension request must include:
 - i. A showing of a good-faith effort by the electrical corporation to ask the Data Request Stakeholder to agree to the extension and the result of such effort,
 - ii. The data request or portion of the data request requiring an extension,
 - iii. Good cause for the extension, and
 - iv. A proposed date of response in lieu of the original deadline.

- d. Any extension request must be received by Energy Safety by 5:00 p.m. one business day prior to the date the data request response is due.

6.3 Stakeholder Data Requests During the WMP Review Period

A Data Request Stakeholder may specify a three-business-day response period for WMP-related data requests during the WMP review period. For the purpose of a data request from a Data Request Stakeholder, the WMP review period for an electrical corporation begins on the date of the WMP submission and lasts until Energy Safety issues its Decision for the electrical corporation.

6.4 Data Requests Criteria for Data Request Stakeholders

Data requests from Data Request Stakeholders must adhere to the following:

1. Data requests must seek information relevant to the pending docket matter and be designed to facilitate the stakeholder's ability to make an informed public comment.
2. Data Request Stakeholders making data requests must consider the volume and nature of the data being requested when negotiating response deadlines outside of those set forth in Section 6.2.
3. Data Request Stakeholders must avoid extensive and comprehensive data requests in the six weeks before an electrical corporation is required to submit its WMP if the data could reasonably be requested outside of that timeframe.
4. Data Request Stakeholders making data requests must not make requests where such information is otherwise available, namely:
 - a. Contained in the electrical corporation's submission,
 - b. Previously requested by Energy Safety, or
 - c. Previously requested by other Data Request Stakeholders.

6.5 Request to Compel or Limit Stakeholder Data Requests

Data Request Stakeholders and electrical corporations must endeavor to resolve all data request disputes amongst themselves. For data request disputes that cannot be resolved, parties to the dispute may seek relief in accordance with the process below:

1. Prior to filing a request to compel or limit data requests, the parties to the dispute must have previously met and conferred in a good faith effort to informally resolve the dispute.
2. The party seeking to compel or to limit data requests bears the burden of proving the reasons why Energy Safety should compel or limit the data request.
3. A request to compel or limit a data request must include:
 - a. Facts showing a good faith attempt at an informal resolution of the data request dispute presented by the request,
 - b. The data request or portion of the data request at issue,
 - c. Basis to compel or limit the data request, and
 - d. A proposed determination that clearly indicates the relief requested.
4. A response from a Data Request Stakeholder or electrical corporation must be submitted within three business days of the date that the request was submitted to Energy Safety. If no response is submitted to request to compel or limit a data request, then the request will be deemed granted. Energy Safety will take requests to compel or limit a data request under consideration and will issue a determination on a request to compel or limit a data request after the request and response have been submitted. Energy Safety may request clarification or additional information from the parties to the dispute prior to issuing a determination. Responses to such requests for clarification or additional information must be submitted within three business days of the date of the request.

All filings for a request to compel or limit data requests must be submitted to Energy Safety at safetypolicy@energysafety.ca.gov and served to all parties to the dispute.

7 Errata

An erratum is a correction of published text by the electrical corporation and does not include revisions required by Energy Safety as part of the Revision Notice process.⁹

If Energy Safety issues an errata submission request, the electrical corporations must respond in the manner designated in the request.

⁹ A reference to the Wildfire Mitigation Plan Guidelines will be added for the Revision Notice process. Package 1 of the [Draft Mitigation Plan Guidelines](#) was published November 12, 2024 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57612&shareable=true>, accessed December 24, 2024).

An electrical corporation may submit errata without an Energy Safety issued errata submission request as follows:

1. After the submission deadline, an electrical corporation may submit to the appropriate year's docket **substantive errata** within 10 business days after the submission deadline. After 10 business days, an electrical corporation must request permission through written request to the Deputy Director prior to filing any substantive errata.
 - **Substantive errata** are corrections to targets, calculations, initiatives, etc., that materially impact Energy Safety's evaluation of a submission.
2. An electrical corporation may submit **nonsubstantive errata** within 30 business days after the submission deadline.
 - **Nonsubstantive errata** are minor corrections to fix typographical errors or to improve clarity.

When submitting errata or a request to submit errata to the Deputy Director, an electrical corporation must include the following:

1. A cover letter with a summary of the corrections, including,
 - a. Whether the errata submission is substantive or nonsubstantive,
 - b. The page number, section number, and table or figure number (if applicable) of the corrections,
 - c. A description of the corrections, and
 - d. Reason for the corrections; and
2. A redline of the page or pages of the submission showing the corrections.

Classification of errata as substantive or nonsubstantive is solely within the discretion of Energy Safety.

8 Electrical Corporation Submission Requirements

An electrical corporation must submit its documents to the appropriate docket for each workstream.

8.1 Naming Convention

Electronic file names must follow the standardized electronic naming convention illustrated in Table 1 below. The electronic file name must include, in order, the naming convention

identified in each column (without quotation marks), with an underscore between the character string of each column. See examples below.

Examples for Electrical Corporations:

- Initial Version of a 2023-2025 Base WMP Submission by PG&E: “PGE_2023-2025_Base-WMP_R0”
 - Note: Base WMP versions begin at R0 with the first filing and continue through the three-year cycle.
- Initial Version of a 2025 WMP Update Submission by PG&E: “PGE_2025_WMP-Update_R0”
- Initial version of a 2023 Maturity Model Survey by Trans Bay Cable: “TBC_2023_Survey_R0”
- First revision of a 2024 SCA Response Letter by Liberty Utilities: “LU_2024_SCA_ResponseLetter_R1”
- Second revision of an Executive Compensation Structure Submission by Southern California Edison: “SCE_2024_ECSS_R2”
- Initial Version of a 2024 Quarter 4 Safety Certification Quarterly Notification by San Diego Gas & Electric: “SDGE_Q4_QN_R0”

Note: When an electrical corporation files a confidential submission, when filing the redacted version, end the file’s name with REDACTED (e.g., PGE_2025_WMP-Update_R0 REDACTED).

Table 1: Electronic File Naming Convention with Examples

Electrical Corporation Abbreviated Name	Document Year	Document Type	Revision Number
“PGE” (Pacific Gas and Electric Company)	“Years of WMP Cycle” (for Base WMPs)	“WMP-Pre” (Wildfire Mitigation Plan Pre-Submission Check)	R0 (Initial Version)
“SDGE” (San Diego Gas and Electric)	“Update year” (for WMP Updates)	“Base-WMP” (Base Wildfire Mitigation Plan)	R1 (Revision 1)
“SCE” (Southern California Edison)	The relevant year of the submission for all other workstream documents	“WMP-Update” (Wildfire Mitigation Plan Update)	R2 (Revision 2)
“BVES” (Bear Valley Electrical Services)		“Survey” (Maturity Model Survey)	
“LU” (Liberty Utilities)		“RNR” (Revision Notice Response)	
“PC” (PacifiCorp)		“DR-Summary” (Data Request Log)	
“HWT” (Horizon West Transmission)		“ECSS” (Executive Compensation Structure Submission)	
“TBC” (Trans Bay Cable)		“SCA” (Safety Culture Assessment)	
“LSPGC” (LS Power Grid California)			

8.2 Accessibility

Submissions through the Office's e-filing system must be accessible.¹⁰

8.3 Format

Every document submitted to Energy Safety must comply with the formatting requirements below.

1. Documents must:
 - a. Be on a page size of 11 inches long and 8 ½ inches wide;¹¹
 - b. Be in a clear, easily readable font of at least 11 point;
 - c. Have consecutively numbered pages;
 - d. Include the following information on the cover/first page:
 - i. Name of the appropriate docket for submission;
 - ii. Number of the appropriate docket for submission;
 - iii. Title of the document;
 - iv. Version/Revision number of the document; and
 - v. If a confidential version exists, include "Confidential" in red on the confidential version and "Redacted" on the public version.
 - a. Include a list of required and supplemental tables and figures, labeled as follows:
 - vi. Tables required by Energy Safety guidelines: "Table x-x: [Title]"
 - vii. Additional (supplemental) tables offered by the electrical corporation: "Table [EC name] x-x: [Title]"
 - viii. Figures offered by the electrical corporation: "Figure [EC name] x-x [Title]"
2. Electronically filed documents must be word searchable.
3. Electronically filed documents may use electronic signatures.¹²
4. If a document exceeds 1,000 pages, it may be volumized.

¹⁰ For more information, please see the State of California's [Accessibility Standards](https://webstandards.ca.gov/accessibility/) (https://webstandards.ca.gov/accessibility/) including compliance with [Web Content Accessibility Guidelines \(WCAG\) 2.2](https://www.w3.org/TR/WCAG22/) (https://www.w3.org/TR/WCAG22/), Level AA.

¹¹ Pages used primarily for tables, figures, or graphics are exempt from the page size requirement.

¹² Digital signatures must comply with the requirements of Government Code section 16.5.

8.4 Document Description

When submitting to the e-filing system, electrical corporations must provide a clear description of the document submitted.

8.5 Cross-Referencing and Hyperlinking

All electrical corporation submissions over 25 pages must include cross-referencing and hyperlinks to avoid duplication of narratives and provide quick referencing of other relevant sections. All figures and tables must include captions with hyperlinked references in the text. Submissions in PDF format must incorporate electronic bookmarks for all sections, main headings, and subheadings.

8.6 Confidentiality

The submission process for confidential information is set forth in section 29200 of Title 14 of the California Code of Regulations.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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