



To: Compliance Enforcement Docket (#Compliance Guidelines)

Date: June 11, 2025

Re: Notice of Opportunity for Public Comment on Proposed Compliance Guidelines 2025 Update

The Office of Energy Infrastructure Safety (Energy Safety) is seeking written public comment on its recently released proposed Compliance Guidelines 2025 Update. The proposed updated Guidelines provide definitions and impose requirements that electrical corporations must follow in implementation of their Wildfire Mitigation Plans. The proposed updated Guidelines will be considered for adoption at a public meeting, during which there will be an opportunity to provide additional comments. Further information on the date and details of the public meeting will be forthcoming.

Instructions for Submitting Written Public Comments

Anyone interested in submitting written comments on the proposed updated Guidelines may submit comments through Energy Safety's Electrical: Compliance Enforcement – Compliance Guidelines docket, found at the following Energy Safety webpage:

<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=Compliance%20Guidelines>. Energy Safety will accept written comments through **July 11, 2025**. Energy Safety requests that commenters name the files submitted following this pattern: “[*Commenter Name*] – Draft 2025 Compliance Guidelines Comments.” Commenters are encouraged to provide redlines for any changes they recommend to the proposed updated Guidelines.

Document Availability

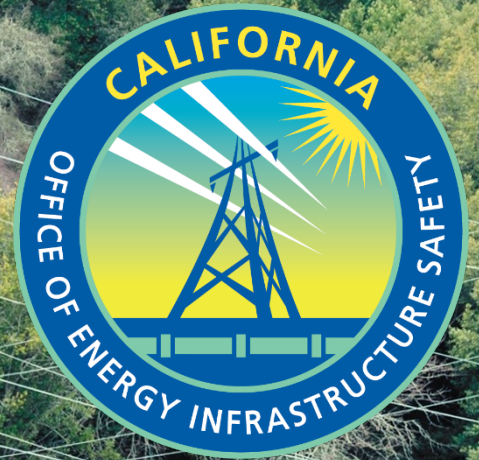
The proposed updated Compliance Guidelines are available on Energy Safety’s Electrical: Compliance Enforcement – Compliance Guidelines docket. To receive notifications when new documents are published, sign up to Energy Safety’s Compliance Enforcement Service List. Existing subscribers to the Compliance Enforcement Service List will continue to receive notifications for all Electrical: Compliance Enforcement dockets. For information on subscribing to Energy Safety’s service lists, visit the following Energy Safety webpage for participating in Energy Safety proceedings: <https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/>.

For questions regarding this notice and the proposed updated Guidelines, contact Energy Safety via email at compliance@energysafety.ca.gov with the subject line: “Compliance Guidelines 2025 Update.”

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick Doherty', with a stylized, cursive script.

Patrick Doherty
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety



OFFICE OF ENERGY INFRASTRUCTURE SAFETY COMPLIANCE GUIDELINES

DRAFT

JUNE 2025

TABLE OF CONTENTS

| | |
|--|-----------|
| 1.0 Introduction..... | 1 |
| 1.1 Authority | 1 |
| 1.2 Purpose and Scope | 1 |
| 2.0 Definitions | 1 |
| 3.0 Notices of Violation | 3 |
| 3.1 Informal Conference | 3 |
| 3.2 Response | 4 |
| 4.0 Wildfire Safety Concerns | 5 |
| 5.0 Executed Work Information Requirements..... | 6 |
| 5.1 Wildfire Mitigation Plan Initiative Construction Standards and Vegetation Management Procedures | 6 |
| 5.2 Electrical Undergrounding Information..... | 6 |
| 5.4 Field Record and Completion Information | 10 |
| 5.4 Hybrid Work Information | 10 |
| 5.5 Electrical Corporation Initiative Tracking Databases..... | 10 |
| 6.0 Electrical Corporation Annual Report on Compliance..... | 11 |
| 7.0 Independent Evaluator Annual Report on Compliance | 15 |
| 8.0 Audits | 16 |
| 8.1 Substantial Vegetation Management Audit | 16 |
| 8.2 Other Audits..... | 17 |
| 8.3 Data Requests..... | 18 |

| | |
|--|----|
| 9.0 File Submission & Naming Convention..... | 18 |
| 10.0 Accessibility | 20 |

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1.0 Introduction

This document sets forth the Office of Energy Infrastructure Safety's (Energy Safety) Compliance Guidelines (Guidelines).

1.1 Authority

The Office of Energy Infrastructure Safety has authority under Government Code section 15475.6 to "adopt guidelines setting forth the requirements, format, timing, and any other matters required to exercise its powers, perform its duties, and meet its responsibilities described in Sections 326, 326.1, and 326.2 and Chapter 6 (commencing with Section 8385) of Division 4.1 of the Public Utilities Code...".

1.2 Purpose and Scope

Pursuant to Public Utilities Code section 8386(b), electrical corporations must annually prepare and submit a Wildfire Mitigation Plan (WMP) to Energy Safety for review and approval. Subsequently, pursuant to Public Utilities Code section 8386.3(c), Energy Safety is charged with overseeing the electrical corporations' compliance with the WMP. Energy Safety's Compliance Guidelines, set forth substantive and procedural requirements for electrical corporations both during and after the annual compliance period.

2.0 Definitions

"Batch" – A list of Wildfire Safety Concerns (WSCs) that Energy Safety observed during its inspections of an electrical corporation's infrastructure. A batch is a spreadsheet that includes the WSCs, their descriptions, and associated details such as location information. Energy Safety may send the list to the electrical corporation.

"Commitment" – Within the WMP, an action that the electrical corporation states it will or plans to accomplish within the compliance period. The commitment may be quantitative or qualitative in nature. Commitments include targets.

"Compliance period" – January 1 to December 31 of each calendar year.

"Expenditure" – The amount of money spent by the electrical corporation on a WMP initiative within the compliance period.

"Goals" – The electrical corporation's general intentions and ambitions.

"Initiative construction standards" – The standard specifications, special provisions, standards of practice, standard material and construction specifications, construction protocols, and construction methods that an electrical corporation applies to mitigation

activities undertaken by the electrical corporation pursuant to a WMP in a given compliance period.

“Mitigation activity” – A measure that contributes to or accomplishes a mitigation initiative designed to reduce the probability of an occurrence of, or the consequences of, a wildfire or outage event. For example, covered conductor installation is a mitigation activity under the mitigation initiative of Grid Design and System Hardening.

“Mitigation category” – The highest subset in the WMP mitigation hierarchy. There are five Mitigation categories in total: Grid Design, Operations, and Maintenance; Vegetation Management and Inspections; Situational Awareness and Forecasting; Emergency Preparedness; and Enterprise Systems. Contains mitigation initiatives and any subsequent mitigation activities.

“Mitigation initiative” – Efforts within a mitigation category either proposed or in process, designed to reduce the consequences and/or probability of wildfire or outage event. For example, Asset Inspection is a mitigation initiative under the mitigation category of Grid Design, Operations, and Maintenance.

“Notice” – A formal notification to an electrical corporation in which Energy Safety identifies and communicates the existence of one or more violations.

“Objective” – Specific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program.

“Proposed expenditure” – The amount of money the electrical corporation estimates that it will spend on a WMP initiative within the compliance period.

“Target” – A forward-looking, quantifiable measurement of work to which an electrical corporation commits to in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports, including Quarterly Data Reports (QDRs) and WMP Updates.

“Vegetation management procedures” – The standard specifications, special provisions, standards of practice, standard material and protocols that an electrical corporation applies to activities undertaken by the electrical corporation pursuant to a WMP initiative in the vegetation management category in a given compliance period.

“Violation” – Noncompliance with an electrical corporation’s approved WMP or any law, regulation, or guideline within Energy Safety’s authority.

“Wildfire Safety Concerns” - Conditions Energy Safety observed during its inspections of an electrical corporation’s infrastructure which may increase the risk of wildfire. When this occurs, Energy Safety may send the electrical corporation a batch of the concerns.

3.0 Notices of Violation

Energy Safety may determine that an electrical corporation is not in compliance with any matter under the authority of the Office.¹ Energy Safety may issue a notice of violation (NOV) when it identifies instances of noncompliance with the WMP or any law, regulation, or guideline within the authority of the Office or a Wildfire Safety Concern when it identifies deficiencies, errors, or conditions that increase the risk of ignition posed by electrical lines and equipment.² Within the NOV, Energy Safety may direct the electrical corporation to correct any noncompliance.⁴ An NOV's corrective action directed by Energy Safety may consist of a requirement to inspect, assess, repair, or remediate subject electrical corporation lines, equipment, records, or vegetation, and report the results of such inspection, assessment, repair, or remediation, including resultant planned or completed corrective actions, or revisions to the electrical corporation's Quarterly Data Report submission.

If Energy Safety assigns a risk category to a violation in an NOV, then Energy Safety directs electrical corporations to correct the violations discovered in accordance with the timelines provided in Table 1.⁵ Otherwise, Energy Safety may prescribe a timeframe for resolution of a violation in an NOV.

Table 1: Energy Safety Violation Correction Timelines by Risk Category

| Risk Category | Violation Correction Timeline |
|-----------------|--|
| Severe | <ul style="list-style-type: none">• Immediate resolution |
| Moderate | <ul style="list-style-type: none">• 2 months (in high fire threat district (HFTD) Tier 3)• 6 months (in HFTD Tier 2)• 6 months (if relevant to worker safety and not in HFTD Tiers 2 or 3) |
| Minor | <ul style="list-style-type: none">• 12 months or resolution scheduled in WMP update |

3.1 Informal Conference

Electrical corporations may request an informal conference with Energy Safety's Compliance Assurance Division or Environmental Science Division, whichever issued the NOV, for the

¹ Gov. Code § 15475.1.

² Gov. Code § 15475.2; Gov. Code § 15475.4; Cal. Code Regs., tit. 14, § 29302.

⁴ Gov. Code § 15475.2.

⁵ CPUC Resolution SPD-27.

purpose of disputing any issues raised in an NOV no later than 10 business days before the response deadline identified in Section 3.2. When requesting such a conference, an electrical corporation must clearly identify the following:

1. The NOV number.
2. Which violation(s) within the NOV identified in (1) are to be discussed.
3. The factual, substantive basis for the conference.
4. Materials the electrical corporation plans to present or cover in the conference, including copies of such materials.
5. Electrical corporation personnel expected to attend the conference, including their titles or roles within the organization.
6. The requested duration of the conference.
7. Dates and times the electrical corporation is available to hold the conference.

Requests for informal conferences with Energy Safety must be emailed to compliance@energysafety.ca.gov or environmentalscience@energysafety.ca.gov, depending on whether the Compliance Assurance Division or Environmental Science Division issued the NOV, with a copy sent to all Energy Safety personnel identified in the subject NOV. Electrical corporations are encouraged to schedule a conference at the earliest possible time to assure an expeditious resolution of any issues. Electrical corporations may submit supplemental information no later than two (2) business days before the informal conference occurs. An informal conference does not extend the response deadline.

3.2 Response

Upon receipt of an NOV the electrical corporation must:

1. Within 30 calendar days, bearing in mind that any deadline that falls on a Saturday, Sunday, or holiday as defined in Government Code section 6700 is moved to the following business day, for each violation identified, provide a written response to Energy Safety that states either:
 - a. The electrical corporation corrected or plans to correct the violation, including a description of all corrective actions taken or planned and the timeline for completing those actions, or
 - b. The electrical corporation will not correct the violation, including the electrical corporation's reasoning or justification for inaction and all supporting documentation.
2. If the electrical corporation notifies Energy Safety that it either has corrected or plans to correct the violation, Energy Safety will specify the type of documentation which the electrical corporation must provide to Energy Safety to document the work performed or acts taken to correct the violation. The electrical corporation must provide that documentation to Energy Safety within 30 calendar days of after

correcting the violation. Upon receipt, Energy Safety will determine if the documentation provided is sufficient assurance of the correction. Examples of documentation that Energy Safety may require to provide assurance of completion of corrective action include, but are not limited to::

- a. Before and after photographs demonstrating that the violation has been corrected.
- b. A corrected version of a dataset, record, or document identified in an NOV as erroneous or deficient.
- c. Work orders or other records documenting the action taken, the date that action was taken, and a point of contact who can provide additional information regarding the action taken.

All files submitted by electrical corporations in accordance with the above must be named and submitted as required in dedicated sections below.

4.0 Wildfire Safety Concerns

During its inspections of an electrical corporation's infrastructure, Energy Safety may observe certain conditions that lead it to believe that the risk of wildfire could subsequently increase. When this occurs, Energy Safety may email the electrical corporation a batch of these conditions, known as Wildfire Safety Concerns (WSCs), in batches⁷.

Within 14 calendar days of receipt of a WSC batch, the electrical corporation must reply, using the spreadsheet provided by Energy Safety, to the email and inform Energy Safety of whether it intends to fix the concern for each of the WSCs. If the electrical corporation does not intend to take corrective action for a given WSC, it must explain why.

Each electrical corporation must send Energy Safety quarterly updates for each of its WSC batches by the tenth day of each quarter (i.e., January 10th, April 10th, July 10th, and October 10th). Each batch must be updated separately and maintained as a separate spreadsheet. Once all WSCs in a batch are either remediated by an electrical corporation or determined not to need remediation by an electrical corporation, an electrical corporation is no longer required to send quarterly updates for that batch.

⁷ See definition of "batch" in Section 2.0 Definitions.

5.0 Executed Work Information Requirements

In order to effectively inspect the work executed in the field by electrical corporations in accordance with their WMPs, Energy Safety requires the electrical corporations to submit the information described in the subsections below. In the event of any conflict between the provisions of this section of the Compliance Guidelines and Energy Safety's Data Guidelines, the language of this section of the Compliance Guidelines controls.

5.1 Wildfire Mitigation Plan Initiative Construction Standards and Vegetation Management Procedures

Electrical corporations must provide the Compliance Assurance Division with copies of initiative construction standards, and the Environmental Science Division with copies of vegetation management procedures, it uses that are applicable to field verifiable WMP initiatives in a given compliance period. Electrical corporations should consult with Energy Safety staff if they are uncertain which WMP initiatives are field verifiable. Energy Safety may refer to these documents when determining if a condition observed during a field inspection is a violation.

The initiative construction standards and vegetation management standards must be provided annually by March 31 by email or an agreed upon secure data transfer system if the files are too large for email. Any update to an initiative construction standard or vegetation management procedure must be sent by email or an agreed upon secure data transfer system if the files are too large for email. Updates should be sent to Energy Safety no later than two weeks after the update becomes effective. Energy Safety requires that files submitted be named in accordance with the dedicated file naming section below.

5.2 Electrical Undergrounding Information

Each electrical corporation must provide the Compliance Assurance Division with spatial data identifying the following types of assets that are related to work on an electrical undergrounding project undertaken pursuant to a WMP: capacitor banks, fuses, switches/reclosers, and transformers.

These spatial data must be provided as a point feature class in a file geodatabase using the WGS 1984 California (Teale) Albers (US Feet) projected coordinate system (WKID Esri

102599).⁹ The required attribute data are detailed in Table 2 below. The submitted geodatabase must be named using the following convention: [Electrical Corporation Abbreviation]_YYYY_Q#_CG.gdb]. The first of these submissions is required on the deadline for the first Quarterly Data Report after the adoption of these Guidelines. This first submission must include the information requested for work on an electrical undergrounding project undertaken pursuant to a WMP completed on or after January 1, 2025.

This information must be updated on a quarterly basis, on the same day Quarterly Data Reports are due. Updates must address the same time period of WMP work as the Quarterly Data Report due on that day.

Table 2: Undergrounding Project Assets

| Field Name | Field Description |
|---------------|--|
| GhID | Unique ID or job ID of the associated grid hardening activity reported in Grid Hardening Point or Line feature pursuant to the Data Guidelines. This field is required. |
| AssetLocation | Is the asset overhead or underground? Possible values: <ul style="list-style-type: none">• Overhead• Underground• Surface (Padmount) This field is required. |

⁹ See Data Guidelines v4.0, Section 3.1, page 12.

| Field Name | Field Description |
|------------|--|
| UtilityID | <p>Standardized identification name of the electrical corporation. Possible values:</p> <ul style="list-style-type: none">• BVES• HWT• Liberty• LS Power• PacifiCorp• PG&E• SCE• SDG&E• TBC <p>This field is required.</p> |
| UMATID | <p>This is the Utility Mitigation Activity Tracking ID, a unique tracking ID for a given activity. This ID must match the UTILITY MITIGATION ACTIVITY TRACKING ID and UMAT fields for the same activity in all data submissions for the activity's entire lifecycle. This field must correspond with the Utility Mitigation Activity Tracking ID referenced where the activity is discussed in the electrical corporation's WMP(s). This field should remain static even if WMP category, WMP initiative, or WMP Section numbers change. This field is required.</p> |
| AssetID | <p>Unique ID for a specific point asset. Foreign key to all the related Asset Point feature class attribute tables. For Support Structure, use Support Structure ID. For Transformer Site, use Transformer Site ID. This field is required IF the activity represented by the point is focused on an individual asset recorded as a point in data submitted to Energy Safety.</p> |

| Field Name | Field Description |
|------------|---|
| AssetType | <p>Identifies the type of asset. Possible values:</p> <ul style="list-style-type: none">• Capacitor bank• Fuse• Switch/Recloser• Transformer <p>This field is required.</p> |
| SegmentID | <p>ID of specific circuit segment inspected, if any. Foreign key to the Asset Line feature classes if the electrical corporation has persistent unique segment IDs. A segment may be anything more granular than a circuit, including a single span. This field is required IF the activity represented by the point is focused on conductor AND the electrical corporation has persistent stable IDs for circuit segments.</p> |
| CircuitID | <p>ID of specific circuit inspected, if any. Foreign key to the Asset Line feature classes if the electrical corporation does not have persistent unique segment IDs. This field is required IF the activity represented by the point is focused on conductor AND SegmentID is not populated.</p> |
| LineClass | <p>Identifies the feature class where the Segment or Circuit ID should be found. Possible values:</p> <ul style="list-style-type: none">• Transmission Line• Primary Distribution Line• Secondary Distribution Line <p>This field is required IF the activity represented by the point is focused on conductor.</p> |

5.3 Field Record and Completion Information

Each electrical corporation must provide Energy Safety with all inspection field notes, long text descriptions, and other narrative information collected from the field during work done pursuant to mitigation activities for mitigation categories of 1) Grid Design, Operations, and Maintenance, and 2) Vegetation Management and Inspections. If short text descriptions or codes are used, (e.g., “Per gf a AMAYA”), the electrical corporation must explain the meaning in plain English. These data must be provided as part of the electrical corporation’s Quarterly Data Report submission on the mitigation activities for mitigation categories of 1) Grid Design, Operations, and Maintenance, and 2) Vegetation Management and Inspections, utilizing the “Field Notes” field in the grid hardening point and/or line feature class available for use by the electrical corporation in making spatial Quarterly Data Report submissions.

This information must be provided beginning with the Quarterly Data Report submission due after the adoption of these Compliance Guidelines.

5.4 Hybrid Work Information

If, pursuant to its WMP, its initiative construction standards, or its vegetation management procedures, an electrical corporation has the option to utilize different kinds of equipment or methods when performing a single mitigation activity in the field, the electrical corporation must specify the specific kind of equipment or method actually utilized for each mitigation activity reported in its spatial Quarterly Data Report submission, utilizing the “DescriptionOfWork” field available for use by the electrical corporation in making spatial Quarterly Data Report submissions.

For example, if an electrical corporation has the option to choose from undergrounding, covered conductor, or line removal to carry out work under a particular mitigation initiative, the electrical corporation must specify in the “DescriptionOfWork” field which of those three options was utilized in the field when carrying out a specific mitigation activity. As an example, if an electrical corporation states in its spatial Quarterly Data Report that it conducted remediation at a certain point, then the electrical corporation must report the specific piece of equipment remediated.

This information must be provided beginning with the spatial Quarterly Data Report submission due no less than 30 calendar days after the adoption of these Compliance Guidelines.

5.5 Electrical Corporation Initiative Tracking Databases

Electrical corporations must provide read-only access to databases which track the status of mitigation activities in the field, including but not limited to spatial databases, upon request by an Energy Safety employee. Each electrical corporation must grant at least read-only

access no later than five calendar days after the request is made, with access lasting for a minimum of 180 calendar days.

An electrical corporation must provide this information beginning with the Quarterly Data Report submission no more than 30 calendar days after the adoption of these Compliance Guidelines.

6.0 Electrical Corporation Annual Report on Compliance

The Electrical Corporation Annual Report on Compliance (EC ARC) must be submitted to Energy Safety via e-filing three months after the end of the compliance period.¹⁰ Accordingly, the EC ARC is due annually on the State business day following March 31. See the section for instructions on file submission and naming convention below. The EC ARC is an electrical corporation's annual self-assessment of compliance with its approved WMP during the recently completed compliance period. The EC ARC must include:

1. A written narrative including:
 - a. Progress Description Summary: A description of the electrical corporation's progress towards achieving the summarized objectives for the three- and ten-year WMP plan cycles, as identified in its most recently approved WMP for compliance years up to 2025.¹² Progress must be discussed individually for each stated objective. Reporting on progress for the summarized ten-year objectives must commence with compliance year 2026.
 - b. Progress Description Detail: A description of the electrical corporation's progress towards achieving the three- and ten-year detailed objectives¹³ listed in the tables in Section 8 of its WMP, including all subsections, with completion dates¹⁴ within the recently completed compliance period. Reporting on progress for the ten-year objectives must commence with compliance year 2026. Each objective must be discussed individually and, at a minimum, include the following:

¹⁰ Pub. Util. Code § 8386.3

¹² See Section 4.2 of the 2023-2025 WMP Technical Guidelines available at:

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>.

¹³ See Section 8 of the 2023-2025 WMP Technical Guidelines, as further defined in tables for each subsection (e.g., 8.1, 8.2, etc.) in the column titled "Objectives for Three Years" or "Objectives for Ten Years" (see exemplar Tables 8-1 and 8-2 on page 77 of 2023-2025 WMP Technical Guidelines).

¹⁴ The date listed in the "Completion Date" column in the associated tables in Section 8 of the WMP.

- i. A listing of the initiative(s) and associated tracking identification numbers the electrical corporation is implementing to achieve the objective.
 - ii. Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective are documented and substantiated.
 - iii. The completion date listed in the approved WMP.
 - iv. A summary of the electrical corporation's progress made during the most recently completed compliance period.
- c. Completion Assessment: An assessment of the electrical corporation's completion of the three- and ten-year objectives¹⁵ listed in the tables in Section 8 of its WMP, including all subsections, with completion dates¹⁶ within the most recently completed compliance period. Reporting on completion for ten-year objectives must commence with compliance year 2026. Each stated objective must be discussed individually and, at a minimum, include the following information:
 - i. A listing of the initiatives and associated tracking identification numbers the electrical corporation is implementing to achieve the objective.
 - ii. Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective are documented and substantiated.
 - iii. The completion date listed in the approved WMP.
 - iv. The date the electrical corporation actually completed the objective.
 - v. An explanation of how the electrical corporation utilized the identified "Method of Verification"¹⁷ to assess the completion of the objective.
 - vi. A summary of the electrical corporation's assessment of completing the objective following use of the verification method described above, including a listing of all evidence relied upon in the electrical corporation's assessment.
 - vii. For each objective that the electrical corporation failed to complete, a detailed explanation of what was incomplete, the reason the initiative

¹⁵ See Section 8 of the 2023-2025 WMP Technical Guidelines, as further defined in tables for each subsection (e.g., 8.1, 8.2, etc.) in the column titled "Objectives for Three Years" or "Objectives for Ten Years" (see exemplar Tables 8-1 and 8-2 on page 77 of 2023-2025 WMP Technical Guidelines).

¹⁶ The date listed in the "Completion Date" column in the associated tables in Section 8 of the WMP.

¹⁷ The value listed in the "Method of Verification" column in the associated tables in Section 8 of the WMP. See 2023-2025 WMP Technical Guidelines, pages 75-77.

- was not completed, and associated corrective actions the electrical corporation has taken to prevent recurrence of such failures.
- viii. If the electrical corporation did not take corrective action to prevent recurrence of such failures, it must provide justification for such inaction.
- d. An assessment of the electrical corporation's completion of all targets¹⁸ identified for each initiative listed in the tables in Section 8 of its WMP, including all subsections, with target completion dates within the most recently completed compliance period.¹⁹ The assessment of each target must be discussed individually and, at a minimum, include the following information:
- i. A complete listing of all applicable targets.
 - ii. The target value and associated target units.
 - iii. The target completion date (i.e., year-end, Q2, Q3, etc.) listed in the WMP.
 - iv. The date the electrical corporation actually completed the target.
 - v. An explanation of how the electrical corporation utilized the identified "Method of Verification"²⁰ to assess the completion of the target.
 - vi. A summary of the electrical corporation's assessment of completing the target following use of the verification method described above, including a listing of all evidence relied upon in the electrical corporation's assessment.
 - vii. For each target that the electrical corporation failed to complete, a detailed explanation of what was incomplete, why, and associated corrective actions the electrical corporation has taken to prevent recurrence of such failures. If the electrical corporation did not take corrective action to prevent recurrence of such failures, it must provide justification for such inaction.

¹⁸ See Section 8 of the 2023-2025 WMP Technical Guidelines, as further defined in tables for each subsection (e.g., 8.1, 8.2, etc.) in columns containing the terms "Target" and "Unit" (see exemplar Tables 8-3 and 8-4 on page 79 of 2023-2025 WMP Technical Guidelines).

¹⁹ For example, for the 2023 WMP compliance period, the pertinent columns from exemplar Tables 8-3 and 8-4 in the 2023-2025 WMP Technical Guidelines would include those titled: "2023 Target & Unit," "Target End of Q2 2023 & Unit," "Target End of Q2 2023 & Unit," and "End of Year Target 2023 & Unit."

²⁰ The value listed in the "Method of Verification" column in the associated tables in Section 8 of the most recently approved WMP. See 2023-2025 WMP Technical Guidelines, pages 75-79.

- viii. An explanation of whether the expected percentage risk reduction,²¹ as listed in the WMP, was achieved during the most recently completed compliance period.
2. If the expected percentage risk reduction was not achieved, the electrical corporation must provide an estimated amount of percentage risk reduction achieved, explain why expected reduction was not achieved, and discuss any actions it has taken as a result.
 - a. If the electrical corporation did not take action, it must provide justification for such inaction.
 - b. An assessment of quality of implementation for initiatives that have a quality control/quality assurance component.
3. A complete listing of all approved petition to amend filings for modification of a WMP requested by the electrical corporation. For each petition, the electrical corporation must include a description of the change requested, the date the electrical corporation filed the petition, and the date that Energy Safety approved the requested petition.²²
4. A list that includes the following information for each initiative identified in the WMP:
 - a. Utility Initiative Tracking ID, per WMP Guidelines.
 - b. Initiative name.
 - c. Planned budget (as reported in the WMP or approved Change Order) for the compliance period.
 - d. Actual expenditure for the most recently completed compliance period.
 - e. If the difference between the actual expenditure and the planned budget is more than 10%, provide a detailed explanation of the reason or reasons for the discrepancy.
5. As an appendix to the EC ARC, a dataset for the compliance period covered by the EC ARC containing fields, tables, and all other information required for a non-spatial Quarterly Data Report submission by Energy Safety's Data Guidelines, provided in the same format required by the Data Guidelines. This information must be current as of the date of its submission with the EC ARC.

²¹ The value listed in the columns titled "x% Risk Impact" in the associated tables in Section 8 of the WMP, and correlated to the respective compliance period, for the identified target. See 2023-2025 WMP Technical Guidelines, pages 78-79.

²² Any outstanding change orders that apply to WMPs reviewed during the effective dates of these Compliance Guidelines will also be considered in a similar manner.

7.0 Independent Evaluator Annual Report on Compliance

In consultation with the Office of the State Fire Marshal (OSFM), Energy Safety must annually post on its website a list of independent evaluators with experience assessing the safe operation of electrical infrastructure before March 1. Within 60 days after Energy Safety publishes the list of independent evaluators, each electrical corporation must complete execution of a contract with an independent evaluator from that list. The independent evaluator must review and assess the electrical corporation's compliance with its WMP and issue an independent evaluator annual report on compliance (IE ARC) by July 1.²³ If the independent evaluator fails to meet any of the RFQ requirements, Energy Safety can reject, disqualify, or remove the independent evaluator from the IE list.

The following requirements apply to each electrical corporation:

1. To address any potential conflicts of interest, within five (5) business days following execution of a contract with an independent evaluator, each electrical corporation must submit via email to Energy Safety's IE Info inbox (IEinfo@energysafety.ca.gov) the following information for all contracts with the contracted independent evaluator within the last three (3) years: date of contract execution, duration of the contract, scope of work, compensation rates, and total contract value.
2. Within three (3) business days following the execution of a contract with an approved independent evaluator, the electrical corporation must provide its contracted independent evaluator with a complete listing of all commitments within its most recently approved WMP.
3. Unless otherwise specified by the independent evaluator, within three (3) business days following receipt of a data request from the contracted independent evaluator, the electrical corporation must provide the information requested.
4. The electrical corporation must copy Energy Safety's IE Info inbox (IEinfo@energysafety.ca.gov) on all written communications between the electrical corporation and its contracted independent evaluator.
5. The electrical corporation must invite Energy Safety via its IE Info inbox (IEinfo@energysafety.ca.gov) to all meetings between the electrical corporation and the contracted independent evaluator.
6. Electrical corporations are prohibited from viewing the independent evaluators' reports or related work products prior to Energy Safety receiving the reports. Energy Safety may allow electrical corporations to conduct a limited review before reports

²³ Pub. Util. Code § 8386.3(c)(2).

are published to ensure that confidential information has been appropriately redacted.

Requirements for independent evaluators are listed in Energy Safety's request for qualifications.

8.0 Audits

8.1 Substantial Vegetation Management Audit

Energy Safety annually conducts an audit of an electrical corporation's compliance with the vegetation management requirements in its approved WMP.²⁴ Energy Safety refers to this audit as the Substantial Vegetation Management (SVM) audit.

Within one month of completion of a substantial portion of its vegetation management requirements in its WMP, the electrical corporation must file a notice of completion with Energy Safety. Only one notice is required and only after a substantial portion of its vegetation management requirements of the WMP is completed for the compliance period. Upon receipt of an electrical corporation's notice that its vegetation management work has been completed, Energy Safety will initiate an audit of the electrical corporation's vegetation management activities for the compliance period. Following completion of its audit, Energy Safety will provide the electrical corporation its findings, including any identified deficiencies. For any deficiencies identified during the audit, the electrical corporation must provide Energy Safety a Corrective Action Plan within 30 calendar days of receipt of the audit, unless another date is specified by Energy Safety at the time of issuance. For each initiative with a finding that all work was not performed, the electrical corporation must provide Energy Safety with a response that addresses the following criteria:

1. Should the electrical corporation disagree with an audit finding that all work was not performed per the WMP, the electrical corporation must provide the basis for that conclusion including detailed supporting documentation and rationale for that response.
2. If the electrical corporation contends it made a good faith effort and met the intent of the initiative by completing a large percentage of the work or addressed the wildfire risk at issue via other vegetation management activities, it must provide specific details and documentation supporting that conclusion.

²⁴ Pub. Util. Code § 8386.3(c)(5)

3. Should the electrical corporation agree with the audit finding that all work was not performed for a vegetation management initiative, the electrical corporation must provide the following in a corrective action plan:
 - a. Data and/or supporting documents explaining why a commitment was missed,
 - b. The circumstances or mitigating factors as to why a commitment was missed,
 - c. If the electrical corporation was aware of the missed commitment during the compliance period, a detailed accounting of any corrective action measures implemented since the end of the compliance period to avoid future missed commitments including long term strategies to reduce or eliminate wildfire risk, and
 - d. Additional actions the electrical corporation plans to implement to ensure commitments of a similar nature are not missed in the future.
4. The response must be titled “[ELECTRICAL CORPORATION]’s_ [YEAR] SVM Audit Corrective Action Plan_YYYYMMDD.”²⁵

Following receipt and review of the electrical corporation’s response, Energy Safety will issue an audit report to the electrical corporation. The audit report will identify whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the compliance period.

For purposes of the SVM audit report, substantial compliance with the substantial portion of vegetation management requirements means that:

1. The electrical corporation’s deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation’s ability to achieve the objectives of its vegetation management programs;
2. The electrical corporation’s effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP; and
3. The electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.

8.2 Other Audits

Energy Safety may conduct other audits as necessary to evaluate electrical corporation performance with respect to its WMP. Energy Safety will notify the electrical corporation prior to commencement of an audit, including requirements for data submissions. Submission deadlines may be contained in the audit notice.

²⁵ “YYYYMMDD” represents the date of submission.

8.3 Data Requests

Each electrical corporation must respond to data requests from either the Compliance Assurance Division or Environmental Science Division with the information sought within the timeframe specified in the data request. If an electrical corporation needs an extension of time in which to respond to a data request, then it must email the originator of the data request within one business day from receipt of the data request copying all emails identified in the original Data Request, requesting an extension and stating both the rationale and the amount of additional time required.

9.0 File Submission & Naming Convention

The requirements, standards, and protocols stated in this section apply to all file submissions received after the effective date of these Guidelines.

All documents must be submitted to the relevant year's associated Docket (e.g., documents related to the 2025 SVM audit must be submitted to either the docket titled 2025_SVM) or to the inbox of the relevant Energy Safety division (compliance@energysafety.ca.gov or environmentalscience@energysafety.ca.gov), depending on which is required for the particular document. See Table 3 for more details.

Electronic file names for documents and data submissions must follow the standardized electronic naming convention with an underscore between the character string as follows: "<name of electrical corporation_document name_YYYYMMDD [date of submission] document type>." Electrical corporation names must be abbreviated as follows:

- "BVES" (Bear Valley Electric Service, Inc.)
- "LU" (Liberty Utilities)
- "HWT" (Horizon West Transmission, LLC)
- "LS" (LS Power Grid California, LLC)
- "PC" (PacifiCorp)
- "PGE" (Pacific Gas and Electric Company)
- "SCE" (Southern California Edison Company)
- "SDGE" (San Diego Gas & Electric Company)
- "TBC" (Trans Bay Cable LLC)

Examples of electronic file names:

- Response to an NOV: “PGE_NOV_CAC5_20230810_1159_20230905_Response” which refers to Pacific Gas and Electric Company’s response submitted on September 5, 2023, to NOV_CAC5_20230810_1159.
- EC ARC: “SCE_2023_ARC_20240331” which refers to Southern California Edison’s 2023 Annual Report on Compliance submitted on March 31, 2024.
- IE ARC: “PC_2023-WMP_IE_ARC_20230711” which refers to PacifiCorp’s independent evaluator’s annual report on compliance on the 2023 WMP submitted on July 11, 2023.
- Response to an SVM audit: “BVES_2021_SVM_Audit_20230904_Response” which refers to Bear Valley Electric Service, Inc.’s response submitted on September 4, 2023, to Energy Safety’s 2021 SVM Audit.

Table 3: Electronic File Submission Locations

| Document Type | Submission Location |
|--|--|
| “NOV Response” (Response to Notice of Violation) | NOV docket for the applicable year within Energy Safety’s e-Filing system |
| “WSC Response” (Response to Wildfire Safety Concern) | Email to Energy Safety’s Compliance inbox (compliance@energysafety.ca.gov), Environmental Science inbox (environmentalscience@energysafety.ca.gov), or wIRe (Wildfire Information & Reporting Application for Energy Safety) as applicable. ²⁶ |
| “NOV Corrective Action” (Documentation supporting corrective action) | Email to Energy Safety’s Compliance inbox (compliance@energysafety.ca.gov), Environmental Science inbox (environmentalscience@energysafety.ca.gov), wIRe (Wildfire Information & Reporting Application for Energy Safety), or the applicable NOV docket within Energy Safety’s e-Filing system as directed by Energy Safety in the NOV document. ²⁷ |

²⁶ Use of wIRe as applicable and as directed by Energy Safety.

²⁷ Use of wIRe as applicable and as directed by Energy Safety.

| Document Type | Submission Location |
|---|--|
| “[ELECTRICAL CORPORATION NAME]’s [APPLICABLE WMP YEAR] ARC” (Annual Report on Compliance) | Applicable EC ARC docket within Energy Safety’s e-Filing system. |
| Data Request Responses | Email to Energy Safety’s Compliance inbox (compliance@energysafety.ca.gov), Environmental Science inbox (environmentalscience@energysafety.ca.gov), or wIRe (Wildfire Information & Reporting Application for Energy Safety) as directed by Energy Safety. ²⁸ |

10.0 Accessibility

It is the policy of the State of California that electronic information be accessible to people with disabilities. Each person who submits information through Energy Safety’s e-filing system must ensure that the information complies with the accessibility requirements set forth in Government Code section 7405. Energy Safety will not accept any information submitted through the e-filing system that does not comply with these requirements.²⁹

²⁸ Use of wIRe as applicable and as directed by Energy Safety.

²⁹ References to laws and regulations related to digital accessibility are available on the [Department of Rehabilitation’s webpage on disability laws and regulations](https://dor.ca.gov/Home/DisabilityLawsandRegulations) (<https://dor.ca.gov/Home/DisabilityLawsandRegulations>, accessed May 2, 2023). Also see the [Department of Rehabilitation’s resources on constructing digitally accessible content](https://www.dor.ca.gov/Home/ConstructingAccessibleContent) (<https://www.dor.ca.gov/Home/ConstructingAccessibleContent>, accessed May 2, 2023).