



To: Compliance Enforcement Docket (#Compliance Guidelines)

Date: October 21, 2025

Re: Notice of Opportunity for Public Comment on Revisions to Proposed Performance Guidelines 2025 Update

The Office of Energy Infrastructure Safety (Energy Safety) is seeking written public comment on revisions to the proposed Performance Guidelines 2025 Update. The proposed revised Guidelines provide definitions and impose requirements that electrical corporations must follow in implementation of their Wildfire Mitigation Plans. The proposed revised 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 revised 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 **November 19, 2025**. Energy Safety requests that commenters name the files submitted following this pattern: “[*Commenter Name*] – Revised Draft 2025 Performance Guidelines Comments.” Commenters are encouraged to provide redlines for any changes they recommend to the proposed revised Guidelines.

Document Availability

The proposed revised Performance 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 revised Guidelines, contact Energy Safety via email at compliance@energysafety.ca.gov with the subject line: “Revised Performance 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 PERFORMANCE GUIDELINES

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OCTOBER 2025

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1.0 Introduction

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

1.1 Authority

Energy 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 Government Code section 15472, et seq, and sections 326.1, 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(b), Energy Safety is charged with overseeing the electrical corporations' implementation of their WMPs. These Guidelines set forth substantive and procedural requirements for electrical corporations both during and after the annual implementation period, to allow Energy Safety to execute its responsibilities to oversee the electrical corporations' implementation of their WMPs. These Guidelines are consistent with Energy Safety's authority under Government Code section 15475.2(b) to adopt guidelines addressing its policies and procedures for administering its power to issue notices of nonperformance to correct deficiencies in an electrical corporation's implementation¹ of its WMP.

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 batch to the electrical corporation.

¹ Gov. Code section 15475.2 uses the term performance to refer to an electrical corporation's WMP activities subject to Energy Safety's oversight, while Pub. Util. Code section 8386.3 uses the term implementation to refer to an electrical corporation's WMP activities subject to Energy Safety's oversight. These Guidelines may use each term interchangeably.

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

“Deficiency” – An instance of electrical corporation’s nonperformance or non-implementation with its approved WMP.

“Expenditure” – The amount of money spent by the electrical corporation on a WMP initiative within the implementation period.

“Implementation period” - January 1 to December 31 of each calendar year.

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

“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.

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

“Target” – A forward-looking, quantifiable measurement of work to which an electrical corporation commits to in its WMP.

“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 performance period.

“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.

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3.0 Notices of Nonperformance

Energy Safety may determine that an electrical corporation is not performing its approved WMP. Energy Safety may issue a Notice of Nonperformance (NON) when it identifies deficiencies with the electrical corporation's implementation of its approved WMP.²

Energy Safety may also issue a Wildfire Safety Concern to an electrical corporation when it identifies deficiencies, errors, or conditions that increase the risk of ignition posed by electrical lines and equipment.³

Within the NON, Energy Safety may direct the electrical corporation to correct any deficiency.⁴ In a NON, Energy Safety may direct corrective action that includes 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.

If Energy Safety assigns a risk category to a deficiency in an NON, then Energy Safety directs electrical corporations to correct the deficiencies discovered in accordance with the timelines provided in Table 1. Otherwise, Energy Safety may prescribe a timeframe for resolution of a deficiency in an NON.

Table 1: Energy Safety Deficiency Correction Timelines by Risk Category

Risk Category	Deficiency Correction Timeline
Severe	• Immediate resolution
Moderate	• 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	• 12 months

3.1 Informal Conference

An electrical corporation may request an informal conference with Energy Safety for the purpose of disputing any issues raised in an NON no later than 10 business days before the

² Gov. Code §§ 15475.1 and 15475.2.

³ Gov. Code § 15475.1(a).

⁴ Gov. Code § 15475.2(a)(2).

response deadline identified in Section 3.2. When requesting such a conference, an electrical corporation must clearly identify the following:

1. The NON number.
2. Which deficiency or deficiencies within the NON 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 NON, with a copy sent to all Energy Safety personnel identified in the subject NON. Electrical corporations are encouraged to schedule a conference at the earliest possible time to permit 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 NON the electrical corporation must, 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 deficiency identified, provide a written response to Energy Safety that states how the electrical corporation corrected or plans to correct the deficiency, including a description of all corrective actions taken or planned and the timeline for completing those actions.

Upon receipt of the response, 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 deficiency. The electrical corporation must provide that documentation to Energy Safety within 30 calendar days after correcting the deficiency. Upon receipt, Energy Safety will determine if the documentation provided is sufficient to demonstrate the correction. Examples of documentation that Energy Safety may require to provide demonstration of completion of a corrective action include, but are not limited to:

1. Before and after photographs demonstrating that the deficiency has been corrected.
2. A corrected version of a dataset, record, or document identified in an NON as deficient.

3. 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).⁵

Within 14 calendar days of receipt of a WSC batch,⁶ 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).⁷ Each electrical corporation may submit this quarterly update as a single spreadsheet, so long as the unique Record IDs are maintained for each individual WSC.

5.0 Executed Work Information Requirements

In order to effectively inspect the work performed in the field by electrical corporations in accordance with their WMPs, Energy Safety requires the electrical corporations to submit the information described below.

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 implementation period. An electrical corporation may consult with

⁵ See definition of "batch" in Section 2.0 Definitions.

⁶ Any deadline that falls on a Saturday, Sunday, or holiday as defined in Government Code section 6700 is moved to the following business day.

⁷ Any deadline that falls on a Saturday, Sunday, or holiday as defined in Government Code section 6700 is moved to the following business day.

Energy Safety staff if it is 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 deficiency.

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.

6.0 Electrical Corporation Annual Implementation Report

Public Utilities Code section 8386.3(b)(1) requires each electrical corporation to annually file with Energy Safety a self-evaluation report addressing the electrical corporation's implementation of its approved WMP during an implementation period.

The Electrical Corporation Annual Implementation Report (EC AIR), where the electrical corporation self-evaluates its implementation of its approved WMP during an implementation period must be submitted to Energy Safety via e-filing by April 1 of each year, beginning in 2026.⁸ To facilitate Energy Safety's oversight of electrical corporations' implementation of their WMPs, the EC AIR 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 years up to and including 2025.⁹ Progress must be discussed individually for each stated objective.
 - b. Progress Description Detail: A description of the electrical corporation's progress towards achieving the three- and ten-year detailed objectives listed in the tables in Section 8 of its WMP,¹⁰ including all subsections, with completion dates within the recently completed implementation period, as identified in its

⁸ Pub. Util. Code § 8386.3(b)(1)

⁹ 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>.

¹⁰ 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).

most recently approved WMP for years up to and including 2025.¹¹ Each objective must be discussed individually and, at a minimum, include the following:

- 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 implementation period.
- c. Completion Assessment: An assessment of the electrical corporation's completion of the three- and ten-year objectives listed in the tables in Section 8 of its WMP,¹² including all subsections, with completion dates within the most recently completed implementation period, as identified in its most recently approved WMP for implementation years up to and including 2025.¹³ 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"¹⁴ 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,

¹¹ The date listed in the "Completion Date" column in the associated tables in Section 8 of the WMP.

¹² 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).

¹³ The date listed in the "Completion Date" column in the associated tables in Section 8 of the WMP.

¹⁴ 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.

- 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 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 targets¹⁵ 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 implementation period.¹⁶ 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"¹⁷ 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

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 columns containing the terms "Target" and "Unit" (see exemplar Tables 8-3 and 8-4 on page 79 of 2023-2025 WMP Technical Guidelines).

¹⁶ For example, for the 2023 WMP performance or implementation 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 Q3 2023 & Unit," and "End of Year Target 2023 & Unit."

¹⁷ 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.

corrective action to prevent recurrence of such failures, it must provide justification for such inaction.

- viii. An assessment of quality of implementation for initiatives that have a quality control/quality assurance component.
- ix. An explanation of whether the expected percentage risk reduction,¹⁸ as listed in the WMP, and if desired the intended risk reduction, was achieved during the most recently completed implementation period.
 - 1. If the expected percentage risk reduction of a WMP initiative was not achieved, the electrical corporation must provide the percentage risk reduction actually achieved, explain why expected reduction was not achieved, and discuss any actions it has taken as a result.
 - 2. If the electrical corporation did not take action as a result of missed risk reduction, it must provide justification for such inaction.
 - 3. Initiative information with reduced risk reduction must also be provided in a table with the format shown in Table 2. In the table, the first column is the name or identifying number of the WMP initiative. The second, third, and fourth columns are the value of risk reduction anticipated in the associated WMP for the given initiative, the estimated actual risk reduction achieved, and an explanation of the actual risk reduction or additional actions taken as a result.
 - 4. If it wishes to do so, the electrical corporation may also discuss the overall risk reduction intent associated with a WMP initiative, whether that risk reduction intent was achieved, and discuss any actions it has taken as a result.

Table 2: Format for Table Response on Risk Reduction Achieved

WMP Initiative	WMP Expected Risk Reduction	Actual Risk Reduction Achieved	Explanation and Actions Taken

¹⁸ 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 performance or implementation period, for the identified target. See 2023-2025 WMP Technical Guidelines, pages 78-79.

WMP Initiative	WMP Expected Risk Reduction	Actual Risk Reduction Achieved	Explanation and Actions Taken

2. 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.¹⁹
3. 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 implementation period.
 - d. Actual expenditure for the most recently completed implementation 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.

7.0 Independent Evaluator Annual Implementation Report

In consultation with the Office of the State Fire Marshal (OSFM), Energy Safety must annually post on its website a list of independent evaluators (the IE list) 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 implementation of its approved WMP and issue an independent evaluator annual implementation report (IE AIR) by July 1.²⁰ If

¹⁹ Any outstanding change orders that apply to WMPs reviewed during the effective dates of these Performance Guidelines will also be considered in a similar manner.

²⁰ Pub. Util. Code § 8386.3(b)(2)(B)(i).

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

Requirements for independent evaluators are listed in the terms in the independent evaluator Request for Qualifications (IE RFQ) scope of work developed by Energy Safety and other directions regarding the form and contents of the report.

8.0 Audits

8.1 Vegetation Management Audit

Energy Safety may audit the vegetation management work performed by, or on behalf of, an electrical corporation associated with the commitments in its approved WMP²¹ after each annual performance period. Energy Safety refers to these audits as the WMP Vegetation Management (VM) Audits.

Energy Safety may begin the VM Audit after the electrical corporation has filed its final quarterly data report (QDR) for the performance period (the Q4 data report due on or before February 1 of the following year). Upon receipt of all quarterly data reports for the performance period, Energy Safety may initiate an audit of the electrical corporation's vegetation management activities within that performance period. Following completion of its audit, Energy Safety will provide the electrical corporation its findings, including any identified deficiencies, in an initial audit report. For any deficiencies identified during the audit, the electrical corporation must provide Energy Safety a Corrective Action Plan (CAP) within 30 calendar days of receipt of the initial audit, unless another date is specified by Energy Safety. For each initiative identified as deficient, the electrical corporation must provide Energy Safety one or more of the following:

- Supplemental data and/or supporting documentation substantiating completion of all work on the vegetation management commitment identified as incomplete or otherwise deficient in the audit during the performance period;
- Detailed documentation of constraint(s) that prevented completion of the work commitment and actions the electrical corporation has taken to resolve those constraints during the performance period; and/or
- Detailed description of corrective actions the electrical corporation has implemented or plans to implement to address outstanding deficiencies identified in past or current vegetation management audits, including the date of implementation.

Following receipt and review of the electrical corporation's response, Energy Safety will issue an audit report to the electrical corporation identifying any outstanding deficiencies in the electrical corporation's implementation of or planned corrective actions relative to the vegetation management commitments in its WMP. This report will be publicly available on Energy Safety's E-Filing system.

²¹ Pub. Util. Code § 8386.3(5)(A)

8.2 Other Audits

Energy Safety may conduct other audits as necessary to evaluate electrical corporation implementation of 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.

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, and the timeframe for a response specified in the data request is eight calendar days or more, then it must email the originator of the data request within seven calendar days 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. If the timeframe for a response specified in the data request is less than eight calendar days, then the electrical corporation must seek an extension of the deadline, if necessary, as soon as practicable.

Data requests that include data files (Excel, CSV, etc.) must be accompanied by sufficient metadata including data table attributes and descriptions.

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 VM audit must be submitted to either the docket titled 2025_VM) 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 NON: “PGE_NON_CAC5_20260810_1159_20260905_Response” which would refer to a hypothetical Pacific Gas and Electric Company response submitted on September 5, 2026, to NON_CAC5_20260810_1159.
- EC AIR: “SCE_2025_AIR_20260401” which would refer to a hypothetical Southern California Edison 2025 Annual Implementation Report submitted on April 1, 2026.
- IE AIR: “PC_2025-WMP_IE_AIR_20260711” which refers to a hypothetical Independent Evaluator’s Annual Implementation Report regarding PacifiCorp’s implementation of its 2025 WMP submitted on July 11, 2026.
- Response to an VM audit: “BVES_2021_VM_Audit_20230904_Response” which refers to Bear Valley Electric Service, Inc.’s response submitted on September 4, 2023, to Energy Safety’s 2021 VM Audit.

Table 3. Expected Electronic File Submission Locations

Document Type	Submission Location
“NON Response” (Response to Notice of Nonperformance)	NON 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. ²²

²² Use of wIRe as applicable and as directed by Energy Safety.

Document Type	Submission Location
“NON 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 NON docket within Energy Safety’s e-Filing system as directed by Energy Safety in the NON. ²³
“[ELECTRICAL CORPORATION NAME]’s [APPLICABLE WMP YEAR] AIR” (Annual Implementation Report)	Applicable EC AIR docket within Energy Safety’s e-Filing system.
“[ELECTRICAL CORPORATION]’s_ [YEAR] VM Audit Corrective Action Plan_YYYYMMDD” (VM Audit Corrective Action Plan and supporting documentation)	Email to Environmental Science inbox (environmentalscience@energysafety.ca.gov) and copy Audit Branch Supervisor and Audit Branch Project Manager
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. ²⁴

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

²³ Use of wIRe as applicable and as directed by Energy Safety.

²⁴ Use of wIRe as applicable and as directed by Energy Safety.

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.²⁵

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²⁵ 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).