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Gavin Newsom, Governor

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Caroline Thomas Jacobs, Director

January 28, 2026

Cameron Fredkin
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Subject: Enclosed is the Office of Energy Infrastructure Safety's Decision for the LS Power Grid California 2026-2028 Base Wildfire Mitigation Plan

Mr. Fredkin:

Enclosed is the Decision of Office of Energy Infrastructure Safety approving the LS Power Grid California's (LSPGC)'s 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP).

On November 14, 2025, Energy Safety published a draft of this Decision for public review and comment.

Opening comments on the draft Decision were due on December 8, 2025, and reply comments were due on December 18, 2025.

No stakeholder comments were received during either of these comment periods. Energy Safety made non-substantive changes to correct typographical errors in the text.

Sincerely,

/s/ Tony Marino

Tony Marino
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

OFFICE OF ENERGY INFRASTRUCTURE SAFETY

DECISION

LS POWER GRID CALIFORNIA

2026-2028 BASE WILDFIRE MITIGATION PLAN

January 28, 2026

1. Executive Summary

The LS Power Grid California (LSPGC) 2026-2028 Base Wildfire Mitigation Plan (WMP) is approved.

The Office of Energy Infrastructure Safety (Energy Safety) works to ensure electrical corporations construct, maintain, and operate electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment. Pursuant to Public Utilities Code section 8386.3(a), this Decision serves as Energy Safety's assessment and approval of the LSPGC 2026-2028 Base WMP R1, dated November 21, 2025, which is inclusive of all changes resulting from the previously submitted errata.

LSPGC is an independent transmission owner. Independent transmission owners (ITOs) are transmission-only electrical corporations with no end-use customers. These electrical corporations have limited assets and footprints compared to the large investor-owned utilities and small and multi-jurisdictional investor-owned utilities in California.

In its 2026-2028 Base WMP, LSPGC demonstrated foresight as the company will conduct a wildfire risk assessment ahead of system expansion. During the past two years, it has engaged a third-party consultant to support its transition from a qualitative risk assessment to a quantitative, semi-probabilistic risk modeling capability. This transition represented meaningful progress in LSPGC's ability to systematically evaluate wildfire risk and reflected a proactive effort to align its practices with broader utility risk modeling standards.

Also, this early effort will establish a foundation for estimating system risk in the absence of ignition data. However, the risk model currently accounts only for wildfire consequence and not likelihood, leaving its risk profile incomplete. Energy Safety expects LSPGC to build upon this foundation by incorporating likelihood into future risk modeling to ensure a more comprehensive view of wildfire risk.

Additionally, LSPGC identified plans to investigate advanced protection third-party technologies set to begin in 2026. The third-party technologies planned for integration include broken conductor detection and third-party devices for real-time grid monitoring to detect faults and line breaks. LSPGC reported it will commit to implementing applicable findings by the end of the 2026-2028 Base WMP cycle. In parallel, LSPGC proposed that it will perform annual dissolved gas analysis testing to support early detection of transformer issues and reduce the likelihood of equipment-related failures. Together, these initiatives are intended to strengthen system resiliency and minimize equipment-driven risks.

However, LSPGC has areas where it needs to improve. LSPGC's internal priority scale for work orders and maintenance issues lacks clear distinction between immediate and near-term repairs. In addition, the implementation of a high fire-threat district (HFTD) training program is scheduled after energization of the Fern Road Substation, which is LSPGC's highest risk-asset, creating a gap in workforce readiness. Finally, vegetation inspection planning remained incomplete, with inconsistent inspection intervals and no finalized procedures for transmission lines in California. Energy Safety expects LSPGC to address these gaps to ensure compliance and operational readiness.

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2. Introduction

Energy Safety approves the LSPGC 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP), R1, which includes revisions resulting from the previously submitted errata.

LSPGC submitted its 2026-2028 Base WMP R1 on November 21, 2025. This Base WMP covers a three-year period from 2026 through the end of 2028 (the WMP cycle). LSPGC prepared its Base WMP in accordance with the requirements set forth in the Energy Safety WMP Guidelines.

2.1 2026-2028 Base WMP Submission and Publication Summary

This section provides a list of the 2026-2028 Base WMP submissions and publications by LSPGC and Energy Safety. Information regarding the submission types can be found in the Energy Safety WMP Guidelines.

- 06/13/2025 - LSPGC submitted its 2026-2028 Base WMP Pre-Submission
- 06/27/2025 - Energy Safety issued the Pre-Submission Check Sufficiency Determination for the LSPGC 2026-2028 Base WMP Pre-Submission
- 07/25/2025 - LSPGC submitted its 2026 Maturity Survey
- 07/25/2025 - LSPGC submitted its 2026-2028 Base WMP
- 11/14/2025 - Energy Safety issued a Notice on Errata for LSPGC 2026-2028 Base WMP R0
- 11/14/2025- Energy Safety issued a Draft Decision on the LSPGC 2026-2028 Base WMP R0
- 11/21/2025 - LSPGC submitted its revised 2026-2028 Base WMP R1

2.2 Consultation with California Department of Forestry and Fire Protection

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

2.3 Public Comment

2.3.1 Comments on the LSPGC 2026-2028 Base WMP

Energy Safety did not receive any public comments on the LSPGC 2026-2028 Base WMP.

2.3.2 Comments on the Draft Energy Safety Decision for the LSPGC 2026-2028 Base WMP

Energy Safety did not receive any public comments on the Draft Decision for the LSPGC 2026-2028 Base WMP.

2.4 Environmental Compliance

An approved WMP shall not be construed as relieving any electrical corporation from complying with all applicable local, state, or federal environmental requirements. A list of selected examples of state environmental requirements is available on Energy Safety's website for reference.[1] Electrical corporations should reach out to the primary agency responsible for an environmental requirement for any additional information.

2.5 Area for Continued Improvement Reporting

Reporting of required progress for areas for continued improvement in this Decision fall into the categories of due by next WMP Update or next Base WMP. Areas for continued improvement that require progress by the next WMP Update will be due no sooner than a 2027 WMP Update. The timing and period covered by the next Base WMP have yet to be decided. The schedule for upcoming WMP submissions is pending development due to ongoing implementation of 2025 California Legislative Service Chapter 119 (Senate Bill 254, Becker) ("SB 254").

SB 254, which became law on September 19, 2025, impacts WMP cycles, submission schedules, and technical requirements, and imposes new and amended statutory requirements on the existing WMP process. Energy Safety is working to implement the changes from SB 254 and expects to hold at least one public workshop to gather feedback from electrical corporations and stakeholders on potential changes. Energy Safety plans to issue a WMP submission schedule and to revise its WMP Guidelines to reflect the changes and new requirements.

[1] Examples of State Environmental Requirements.

3. Introductory Sections of the WMP

LSPGC provided the required information for the following sections in accordance with Chapter III of the WMP Guidelines:

- Section 1: Executive Summary
- Section 2: Responsible Persons
- Section 3: Overview of the WMP (Primary Goal, Plan Objectives, Prioritized List of Wildfire Risks and Risk Drivers, Performance Metrics, Projected Expenditures, and Climate Change)
- Section 4: Overview of the Service Territory (Service Territory, Catastrophic Wildfire History, and Frequently Deenergized Circuits)

4. Projected Expenditures

LSPGC provided the required information[2] regarding projected expenditures in accordance with Chapter III, Section 3.6 of the WMP Guidelines. LSPGC provided additional information regarding projected expenditure in accordance with the Energy Safety Data Guidelines;[3] a summary of this information is presented below.

Table 4-1 presents the territory-wide expenditure per initiative category by ITOs. Table 4-2 provides ITOs' expenditures per initiative category by HFTD vs non-HFTD.

Table 4-1. LSPGC Projected Expenditure Comparison[4]

	Trans Bay Cable		Horizon West		LS Power	
WMP Initiative Category	Total Territory	% of Grand Total	Total Territory	% of Grand Total	Total Territory	% of Grand Total
Wildfire Mitigation Strategy	$0	$0	$0	$0	$0.0	0.00%
Vegetation Management and Inspections	$0	$0	$1.2M	61.9%	$82.0K	11.04%
Situational Awareness and Forecasting	$0	$0	$0	$0	$452.0K	60.8%
Risk Methodology and Assessment	$0	$0	$0	$0	$0.0	0.00%
Grid Design, Operations, and Maintenance	$0	$0	$0	$0	$137.0K	18.4%
Enterprise Systems	$0	$0	$0	$0	$0.0	0.00%
Emergency Preparedness, Collaboration and Public Awareness	$0	$0	$750.0K	38.1%	$72.0K	9.7%
Grand Total	**$0**	**0%**	**$2.0M**	**100%**	**$743.0K**	**100%**

[2] Energy Safety's WMP evaluation and decision on a WMP is not an approval of, or agreement with, costs listed in the WMP.

[3] Data Guidelines, pages 165-167.

[4] Trans Bay Cable reported "Not applicable" for all expenditure. Horizon West and LS Power reported "Not applicable" in categories where zero is reported here. Specifically, Trans Bay Cable, Horizon West, and LS Power reported no planned expenditure for covered conductor, undergrounding, asset inspections, or customer support in wildfire and PSPS emergencies.

Table 4-2. LSPGC Projected Expenditure Comparison HFTD vs Non-HFTD[5]

WMP Initiative Category	Trans Bay Cable			Horizon West			LS Power		
	HFTD	Non-HFTD	% Spend in HFTD	HFTD	Non-HFTD	% Spend in HFTD	HFTD	Non-HFTD	% Spend in HFTD
Wildfire Mitigation Strategy	$0	$0	$0	$0	$0	$0	$0	$0	0%
Vegetation Management and Inspections	$0	$0	$0	$1.2M	$0.0	100%	$0	$82.0K	0%
Situational Awareness and Forecasting	$0	$0	$0	$0	$0	$0	$0	$452.0K	0%
Risk Methodology and Assessment	$0	$0	$0	$0	$0	$0	$0	$0	0%
Grid Design, Operations, and Maintenance	$0	$0	$0	$0	$0	$0	$45.0K	$92.0K	33%
Enterprise Systems	$0	$0	$0	$0	$0	$0	$0	$0	0%
Emergency Preparedness, Collaboration and Public Awareness	$0	$0	$0	$750.0K	$0.0	100%	$8.0K	$64.0K	11%
Grand Total	**$0**	**$0**	**$0**	**$2.0M**	**$0**	**100%**	**$53.0K**	**$690.0K**	**7.1%**

[5] Only Horizon West reported planned expenditures for vegetation management and inspections in HFTD.

5. Risk Methodology and Assessment

Chapter III, Section 5 of the WMP Guidelines requires the electrical corporation to provide an overview of its risk methodology, key input data and assumptions, risk analysis, and risk presentation (i.e., the results of its assessment).[6] The LSPGC 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

5.1 Discussion

This section discusses Energy Safety's evaluation of the risk methodology and assessment section of the LSPGC 2026-2028 Base WMP.

5.1.1 Risk Analysis Framework

LSPGC's risk analysis addresses LSPGC's only energized and operating asset as of the submission of its 2026-2028 Base WMP, the Orchard Substation, and LSPGC's additional assets that it plans to energize over the course of the 2026-2028 Base WMP cycle.[7] LSPGC reported that it will conduct a wildfire risk assessment during its 2026-2028 Base WMP cycle, which will allow LSPGC to estimate its wildfire risk profile despite having limited operational history.[8] Notably, LSPGC's effort demonstrates a proactive approach to wildfire risk analysis, undertaken in advance of planned system expansions, highlighting LSPGC's commitment to anticipating and mitigating potential risks.

Since LSPGC is not directly responsible for providing power to customers in California, LSPGC stated that its overall utility risk was solely comprised of wildfire risk and did not include outage program risk.[9] Additionally, wildfire risk, was modeled solely on wildfire consequence and did not incorporate wildfire likelihood.[10] LSPGC explained that it excluded likelihood because it had no ignition history, but for the purposes of its wildfire risk modeling, it assumed ignitions were equally likely across its facilities and assumes all ignitions could result in a wildfire.[11]

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[6] Pub. Util. Code §§ 8386(c)(3), (8), (12)-(13), (17)-(18).

[7] LSPGC, 2026-2028 Base WMP R1, pages 17-18.

[8] LSPGC, 2026-2028 Base WMP R1, page 25.

[9] LSPGC, 2026-2028 Base WMP R1, pages 26-27.

[10] LSPGC, 2026-2028 Base WMP R1, pages 26-27.

[11] LSPGC, 2026-2028 Base WMP R1, page 27.

Energy Safety does not expect an ITO to face significant outage program risk, so the inclusion of outage risk is not required. However, the absence of wildfire likelihood from the risk model represents a potential limitation. Risk modeling should calculate both the potential consequences of wildfire events and the likelihood that an electrical corporation's assets could ignite and lead to those wildfire events. For an ITO, analyzing the likelihood of ignition across assets and facilities is essential to identifying areas that present greater risks as possible ignition sources. Not all assets have equal likelihood of starting an ignition, and not all ignitions have equal likelihood of resulting in a wildfire. While LSPGC may not have any historical ignitions, data on what assets lead to potential failures and ignitions has been collected by other electrical corporations and certain trends around asset types and contributing factors have been recorded elsewhere. LSPGC's wildfire risk assessment provides only a partial view of its system risk, and therefore, LSPGC must report on its progress in incorporating ignition likelihood into its risk modeling in its next WMP Update.

See area for continued improvement LSPGC-26B-01 Components of Wildfire Risk in Wildfire Risk Assessment in Section 5.2.

5.1.2 Risk Scenarios

LSPGC listed one design basis scenario in its wildfire risk model within *Table 5-2 Design Basis Scenarios*.[12] The one selected design basis scenario considered extreme wind loading (33-year return interval), long-term weather conditions (20 year history), and the current fuel load.[13] Given that LSPGC has a limited number of assets and is proactively maturing its wildfire risk modeling, the use of this single design basis scenario is sufficient for the 2026-2028 Base WMP.

5.1.3 Risk Analysis Results and Presentation

In *Table 5-5 Summary of Top-Risk Circuits, Segments, or Spans*, LSPGC provided risk scores for its assets. LSPGC explained that, although substations were not typically considered as circuits, segments, or spans, LSPGC included them to comprehensively display wildfire risk across its existing and planned assets.[14]

The Fern Road Substation, which LSPGC stated that it plans to energize in the first quarter of 2026,[15] is the only LSPGC asset located within the Tier 2 HFTD.[16] Its calculated risk score was

[12] LSPGC, 2026-2028 Base WMP R1, page 37.

[13] LSPGC, 2026-2028 Base WMP R1, page 37.

[14] LSPGC, 2026-2028 Base WMP R1, pages 42-44.

[15] LSPGC, 2026-2028 Base WMP R1, page 40.

[16] LSPGC, 2026-2028 Base WMP R1, page 41.

two orders of magnitude higher than the scores of all other LSPGC equipment and lines.[17] This outcome is consistent with expectations, as assets located in HFTD areas generally carry higher wildfire risk compared to assets outside of HFTD.

In Table 5-5, LSPGC included “N/A” in the "Top Risk Contributors” column for all entries.[18] As LSPGC matures in its understanding of the wildfire risk on its system, Energy Safety expects LSPGC to provide its top risk contributors in its next Base WMP submission.

5.1.4 Quality Assurance and Quality Control

LSPGC reported that it has one contractor for risk modeling and that it does not have an additional independent review process for quality assurance and quality control beyond that contractor.[19] Due to the smaller scope and scale of LSPGC’s assets and risk profile,[20] and given that LSPGC’s risk model is newly developed, the use of a third-party contractor without an independent review process is sufficient for the 2026-2028 Base WMP cycle.

As LSPGC matures in its risk modeling for its system, Energy Safety expects LSPGC will report on an independent third-party review of its data collection and risk models in its next Base WMP submission.

5.1.5 Risk Assessment Improvement Plan

LSPGC’s risk assessment approach is proactive and demonstrates it is using risk analysis appropriately to prioritize wildfire mitigation activities.

LSPGC stated that it has made improvements in its risk assessment capabilities, enabling LSPGC to better identify areas of highest wildfire risk and to use that information to inform mitigation selection and prioritization.[21] LSPGC explained that, over the past two years, it has engaged a third party consultant who enabled LSPGC to transition from a qualitative risk assessment to a quantitative, semi-probabilistic risk modeling capability.[22] This transition demonstrates progress on LSPGC’s approach to systematically evaluating wildfire risk and reflects a proactive effort to align its practices with broader utility risk modeling standards.

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[17] LSPGC, 2026-2028 Base WMP R1, page 42.

[18] LSPGC, 2026-2028 Base WMP R1, pages 43-44.

[19] LSPGC, 2026-2028 Base WMP R1, page 45.

[20] LSPGC, 2026-2028 Base WMP R1, pages 17-18.

[21] LSPGC, 2026-2028 Base WMP R1, page 46.

[22] LSPGC, 2026-2028 Base WMP R1, page 46.

LSPGC further stated that it plans to track both risk events and wildfire incidents to inform its quantified risk assessment including timeframes and key milestones for implementing these two plans.[23]

For risk event tracking, LSPGC reported that it anticipates beginning full deployment for logging risk drivers and near-miss events at the Orchard Substation in 2026, using the data in 2027 to support ignition likelihood analysis and to establish quality assurance and quality control and reporting standards.[24] By 2028, LSPGC expects to evaluate the tracking system's performance and apply findings in both mitigation activities and planning for its next Base WMP.[25]

For wildfire incident tracking, LSPGC reported that it plans to initiate a standardized incident classification and data capture process in 2026, analyze correlations with mitigation measures and environmental conditions in 2027, and apply the findings to update wildfire and emergency planning by 2028.[26]

This approach demonstrates that LSPGC used and will continue using risk analysis as a decision-making tool for prioritizing wildfire mitigation activities.

5.2 Previous Areas for Continued Improvement

Energy Safety identifies no previous areas for continued improvement in the Risk Methodology and Assessment section for the LSPGC 2026-2028 Base WMP.

5.3 Areas for Continued Improvement for Future WMP Submissions

As discussed above, Energy Safety has identified areas pertaining to risk methodology and assessment where the electrical corporation must demonstrate improvement in a future, specified WMP submission. This section sets forth the requirements for improvement.

5.3.1 LSPGC-26B-01. Components of Wildfire Risk in Wildfire Risk Assessment

Summary: As part of its 2026-2028 Base WMP, LSPGC has initiated a wildfire risk assessment.[27] LSPGC's quantitative, semi-probabilistic risk modeling demonstrates a proactive approach to

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[23] LSPGC, 2026-2028 Base WMP R1, page 46.

[24] LSPGC, 2026-2028 Base WMP R1, page 48.

[25] LSPGC, 2026-2028 Base WMP R1, page 48.

[26] LSPGC, 2026-2028 Base WMP R1, page 49.

[27] LSPGC, 2026-2028 Base WMP R1, page 25.

wildfire risk analysis, undertaken in advance of planned system expansions, highlighting LSPGC's commitment to anticipating and mitigating potential risks. LSPGC's overall utility risk is currently solely comprised of wildfire risk, which only considers wildfire consequence.[28] In its current risk model, LSPGC does not incorporate ignition likelihood, wildfire likelihood, or burn likelihood.[29] Given the nature of LSPGC's current operational and planned assets, these risk components could provide insights into LSPGC's risk profile.

Requirements: In its next WMP Update, LSPGC must:

- Provide an evaluation of the ignition risk drivers on LSPGC's assets, including:
  - A list of potential asset failures,
  - An evaluation of the likelihood of each of the listed failures occurring based on historical data (internal or external), and
  - An evaluation of the likelihood of each of the listed failures leading to a spark or ignition.
- Provide an evaluation of the likelihood of a spark or ignition from an LSPGC asset propagating into a wildfire, including assessments of the impact of each of the following on risk:
  - Location of the asset,
  - Nearby fuels, and
  - Weather conditions.
- Provide a plan with milestones for incorporating calculated wildfire likelihood, burn likelihood, and ignition likelihood into its wildfire risk assessment.

Discussed in: Section 5.1.1 Risk Analysis Framework

Appendix C provides a consolidated list of areas for continued improvement and requirements.

[28] LSPGC, 2026-2028 Base WMP R1, pages 26-27.

[29] LSPGC, 2026-2028 Base WMP R1, pages 26-27.

6. Wildfire Mitigation Strategy Development

Chapter III, Section 6 of the WMP Guidelines requires the electrical corporation to provide a high-level overview of the risk evaluation process that inform its selection of a portfolio of initiative activities, as well as its overall wildfire mitigation strategy.[30] The LSPGC 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

6.1 Discussion

This section discusses Energy Safety's evaluation of the wildfire mitigation strategy development section of the LSPGC 2026-2028 Base WMP.

6.1.1 Risk Evaluation

LSPGC's timeline for implementing a formal wildfire mitigation activity selection procedure to evaluate risk is appropriate given its operations timeline. LSPGC is also appropriately using its risk assessment to prioritize and select wildfire mitigation activities in its highest-risk area.

LSPGC reported that it was in the process of creating and implementing more formal procedures to identify and select appropriate wildfire mitigation activities and to monitor the implementation of the WMP.[31] In response to a data request, LSPGC provided a timeline for implementing these procedures, with LSPGC beginning development in the fourth quarter of 2026, refining the processes throughout 2027, and finalizing the procedures in the second quarter of 2028 to support its next Base WMP submission.[32] This timeline is reasonable given LSPGC is at an early stage of its operations and only has one energized and operating substation as of the submission of its 2026-2028 Base WMP.[33,34]

In addition to the currently operational substation that is outside of the HFTD, LSPGC plans to energize in Q1 2026 the Fern Road Substation, which is located in Tier 2 HFTD.[35] In *Table 6-1 List of Prioritized Areas in LSPGC Service Territory Based on Overall Utility Risk*, LSPGC identified the Fern Road Substation as its highest-risk asset, representing 94 percent of the utility's

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[30] Pub. Util. Code §§ 8386(c)(3), (12)-(14).

[31] LSPGC, 2026-2028 Base WMP R1, page 52.

[32] LSPGC, Response to DR-001, Question 3, pages 6-7.

[33] LSPGC, 2026-2028 Base WMP R1, pages 17-18.

[34] LSPGC, 2026-2028 Base WMP R1, page 53.

[35] LSPGC, 2026-2028 Base WMP R1, page 18.

overall risk profile, and LSPGC listed transformer failure as the highest driver to that risk.[36] Given that the Fern Road Substation is located within the HFTD,[37] this outcome is consistent with expectations that assets located in HFTD carry higher wildfire risk compared to assets located in non-HFTD.

LSPGC stated that its risk assessments guided the prioritization of mitigation activities at the Fern Road Substation.[38] For example, activities such as update system restoration plan to include Fern Road (EP-01), transformer dissolved gas analysis tests (GD-03), HFTD safety training (GD-06), and defensible space inspections (VM-01) were assigned the highest priority to reduce risk.[39] LSPGC has scheduled its activities to prioritize the highest risk areas (substation in the HFTD) early in the WMP cycle and prioritize transmission line related activities later in the WMP cycle since those assets are not yet energized.[40] This demonstrates that LSPGC appropriately used its risk model to inform the selection and prioritization of mitigation activities for its highest-risk area.

6.1.2 Wildfire Mitigation Strategy

LSPGC's planned mitigation activities demonstrate a focused approach to addressing wildfire risk at its most vulnerable assets, particularly within the HFTD.

LSPGC reported several mitigation activities in its 2026-2028 Base WMP that aimed to address wildfire risk at its highest-risk asset, the Fern Road substation located in the HFTD.[41] These include protection system enhancements (GD-01), monthly substation inspections (GD-02), dissolved gas analysis tests for transformers (GD-03), and HFTD safety trainings (GD-06).[42] In addition, LSPGC stated that it will incorporate maintenance work orders into a third-party system (GD-04) and conduct an annual review and update grid operation procedures (GD-05).[43]

Collectively, these activities demonstrate that LSPGC not only targets the highest sources of risk at Fern Road Substation but also plans to continue to mature operational capabilities.[44]

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[36] LSPGC, 2026-2028 Base WMP R1, page 51.

[37] LSPGC, 2026-2028 Base WMP R1, page 41.

[38] LSPGC, 2026-2028 Base WMP R1, page 53.

[39] LSPGC, 2026-2028 Base WMP R1, page 53.

[40] LSPGC, 2026-2028 Base WMP R1, pages 53-54.

[41] LSPGC, 2026-2028 Base WMP R1, page 57.

[42] LSPGC, 2026-2028 Base WMP R1, page 57.

[43] LSPGC, 2026-2028 Base WMP R1, page 57.

[44] LSPGC, 2026-2028 Base WMP R1, page 57.

LSPGC only considered anticipated risk reduction for in-operation assets. LSPGC explained that it did not include its calculation for anticipated risk reduction at Orchard Substation because it is outside the HFTD, and all mitigations at Orchard Substation focused on meeting statutory requirements and best practices for fire safety.[45] Fern Road Substation, which is the planned asset within Tier 2 HFTD, is not scheduled to be energized until the first quarter of 2026.[46] As such, LSPGC explained, risk reduction estimates could not yet be developed for this site.[47] LSPGC stated that all other planned substations and overhead transmission lines remained in early stage where anticipated risk reduction values could not be determined at this time.[48]

Excluding anticipated risk reduction estimates for assets not yet in operation is reasonable given LSPGC's early stage of operations and risk modeling. As LSPGC matures in its risk modeling for its system and additional facilities come online, Energy Safety expects LSPGC will report on anticipated risk reduction in its next Base WMP.

6.2 Areas for Continued Improvement

Energy Safety identifies no previous or new areas for continued improvement in the Wildfire Mitigation Strategy Development section for the LSPGC 2026-2028 Base WMP.

[45] LSPGC, 2026-2028 Base WMP R1, page 58.

[46] LSPGC, 2026-2028 Base WMP R1, page 58.

[47] LSPGC, 2026-2028 Base WMP R1, page 58.

[48] LSPGC, 2026-2028 Base WMP R1, page 58.

7. Public Safety Power Shutoffs

Chapter III, Section 7 of the WMP Guidelines requires the electrical corporation to provide an overview narrative of planned initiative actions to reduce the impacts of Public Safety Power Shutoff (PSPS) events.[49] The LSPGC 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

7.1 Discussion

This section discusses Energy Safety's evaluation of the PSPS section of the LSPGC 2026-2028 Base WMP.

LSPGC highlighted that as an ITO without distribution facilities or end-use customers, it has never deployed a PSPS since beginning operations at the Orchard Substation.[50] As LSPGC's transmission system expands, it will evaluate its potential need for having formal PSPS procedures.[51]

7.2 Areas for Continued Improvement

Energy Safety identifies no previous or new areas for continued in the Public Safety Power Shutoffs and Assessment section for the LSPGC 2026-2028 Base WMP.

[49] Pub. Util. Code, § 8386(c)(8).

[50] LSPGC, 2026-2028 Base WMP R1, page 63.

[51] LSPGC, 2026-2028 Base WMP R1, page 63.

8. Grid Design, Operations, and Maintenance

Chapter III, Section 8 of the WMP Guidelines requires the electrical corporation to include plans for grid design, operations, and maintenance programmatic areas in its WMP.[52] The LSPGC 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

8.1 Summary of Anticipated Risk Reduction

For the 2026-2028 Base WMP cycle, LSPGC identified several mitigation activities aimed at reducing utility-related wildfire risk. For instance, LSPGC stated it will investigate advanced protection system enhancements for potential inclusion in project design, including broken conductor detection and tripping and third-party technologies.[53] LSPGC is scheduled to begin this review in 2026, complete the review in 2027, and incorporate applicable findings into project design in 2028.[54] If implemented, these enhancements may reduce ignition risk by providing inherent system hardening.

LSPGC stated that it will also conduct annual transformer dissolved gas analysis testing to identify equipment issues that could otherwise remain undetected. LSPGC identified transformer failure as the highest driver to wildfire risk at its Fern Substation,[55] and evaluating transformers with testing that goes beyond what a visual inspection could identify potentially reduces the ignition risk associated with transformer failure.[56]

In addition, LSPGC said it will develop HFTD safety training for field personnel in 2026 and implement it in 2027.[57] This training may reduce wildfire risk by improving personnel awareness and response to hazardous conditions in HFTDs.

8.2 Discussion

This section discusses Energy Safety's evaluation of the grid design, operations, and maintenance section of the LSPGC 2026-2028 Base WMP.

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[52] Pub. Util. Code §§ 8386(c)(3), (6), (10), (14)-(15).

[53] LSPGC, 2026-2028 Base WMP R1, pages 67.

[54] LSPGC, 2026-2028 Base WMP R1, pages 64.

[55] LSPGC, 2026-2028 Base WMP R1, page 51.

[56] LSPGC, 2026-2028 Base WMP R1, page 81.

[57] LSPGC, 2026-2028 Base WMP R1, page 85.

8.2.1 Grid Design and System Hardening

8.2.1.1 Installation of system automation equipment

LSPGC's plan for evaluating system automation equipment including protection setting enhancements and third-party devices demonstrates that LSPGC is proactively investigating technologies to strengthen its system's operational response that may reduce wildfire risk if implemented and shows forward-looking growth.

LSPGC included its plan to investigate protection setting enhancements, including broken conductor detection and tripping, as well as the installation of new third-party technologies to improve system response times (GD-01).[58] LSPGC provided its timeline to, begin the review in 2026, complete its investigation in 2027, and implement applicable enhancements in 2028.[59] Energy Safety expects LSPGC to provide updates on the results of its investigation in the next Base WMP.

8.2.2 Asset Inspections

8.2.2.1 Transmission Inspection

LSPGC included its plan to inspect its transmission lines on a five-year cycle.[60] LSPGC currently has no energized transmission lines.[61] The earliest anticipated transmission lines energization is for Q3 to Q4 2028.[62] LSPGC has 14.3 circuit miles of planned overhead transmission lines outside of the HFTD and none within the HFTD.[63] Given that LSPGC currently has no planned transmission lines within the HFTD, this inspection frequency is sufficient to minimize ignition risk during the 2026-2028 Base WMP cycle.

8.2.2.2 Substation Detailed Inspections

LSPGC included its plan to conduct monthly visual inspections of substations.[64] Monthly inspections align with standard practices among ITOs and keep LSPGC informed of potential risks to its assets that can be visually identified.

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[58] LSPGC, 2026-2028 Base WMP R1, page 67.

[59] LSPGC, 2026-2028 Base WMP R1, page 64.

[60] LSPGC, 2026-2028 Base WMP R1, page 70.

[61] LSPGC, 2026-2028 Base WMP R1, pages 17-18.

[62] LSPGC, 2026-2028 Base WMP R1, pages 17-18.

[63] LSPGC, 2026-2028 Base WMP R1, pages 17-18.

[64] LSPGC, 2026-2028 Base WMP R1, page 71.

8.2.3 Equipment Maintenance and Repair

LSPGC's planned approach to equipment maintenance and repair demonstrates alignment with the other ITOs, which sufficiently reduces wildfire risk from equipment failure.

LSPGC stated that it will perform in-depth testing and analysis on major equipment in accordance with manufacturer recommendations and industry best practices, and that it will follow California Independent Systems Operator (CAISO)-approved maintenance practices for major equipment.[65]

In addition, LSPGC stated that a dissolved gas analysis test will be conducted annually on energized transformers (GD-03), and the results can indicate a wide range of conditions and malfunctions that, if left unaddressed, could result in equipment damage.[66] This test supports early detection of potential failures or malfunctions, thereby reducing the likelihood of transformer-related incidents.

8.2.4 Quality Assurance and Quality Control

LSPGC's plan for quality assurance and quality control is sufficient given LSPGC's early operational stage. Energy Safety expects LSPGC to provide updates on changes and expansions of quality assurance and quality control programs and strategies as more assets come online and LSPGC's operational history increases.

LSPGC stated that it currently maintains a limited infrastructure footprint and does not have any assets currently in operation within the HFTD.[67] LSPGC reported that, in preparation for system expansion, it currently conducts at least one quality assurance audit each year for asset inspections within Tier 2 or Tier 3 HFTD as applicable.[68] This proactive strategy demonstrates a forward-looking mindset of quality assurance and quality control activities.

For operational quality assurance, LSPGC stated it ensures that all qualified field operations personnel who may access Tier 2 or Tier 3 HFTD areas have completed the required HFTD-specific safety training.[69]

As additional substations come online, LSPGC noted that it expects to expand its quality assurance and quality control effectiveness metrics.[70]

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[65] LSPGC, 2026-2028 Base WMP R1, page 73.

[66] LSPGC, 2026-2028 Base WMP R1, page 81.

[67] LSPGC, 2026-2028 Base WMP R1, page 85.

[68] LSPGC, 2026-2028 Base WMP R1, page 85.

[69] LSPGC, 2026-2028 Base WMP R1, page 87.

[70] LSPGC, 2026-2028 Base WMP R1, page 89.

Given its limited assets and operational scale, LSPGC provided sufficient tracking of inspection and maintenance programs.

8.2.5 Work Orders

Per the WMP Guidelines, electrical corporations must align work order prioritization systems with GO 95, Rule 18 levels; if an alternative prioritization is used, it must be included alongside the GO 95 levels with an explanation for the variation.[71] LSPGC has not demonstrated that it has the internal maintenance tracking system to align with GO 95, Rule 18.

LSPGC reported that it employed an internal priority scale from zero to three to track and schedule maintenance issues.[72] In *LSPGC Table 8-3, Work Order Prioritization*, it reported that response to priority zero requires repair immediately or within four weeks of identification; response to priority one requires repair within four weeks to one year; response to priority two requires repair within one to three years; and response to priority three requires repair beyond three years, with monitoring as needed.[73]

In response to a data request about the lack of distinction between immediate repairs and those completed within four weeks, LSPGC stated that a "built-in operational sentiment" ensures that all urgent or hazardous conditions are addressed immediately.[74] LSPGC further clarified that its priority zero condition was mapped to General Order 95 Rule 18 Level 1 condition, which covers safety or reliability risks that must be corrected immediately.[75,76] LSPGC also provided Energy Safety with the Event Reporting Procedure, which outlines emergency response protocols for operations and field personnel. This includes contacts for emergency event reporting, notification instructions for the appropriate regulatory organizations, and the Event Reporting Form.[77,78]

Although LSPGC stated that it maintains programs and procedures in place to respond immediately to emergencies and hazardous condition,[79] LSPGC has not demonstrated that it has the internal maintenance tracking system to reflect that it is addressing critical

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[71] WMP Guidelines, page 98.

[72] LSPGC, 2026-2028 Base WMP R1, page 90.

[73] LSPGC, Substantive/Non-Substantive Errata, page 90.

[74] LSPGC, Response to DR-001, Question 2, pages 3-5.

[75] LSPGC, Response to DR-001, Question 2, page 5.

[76] CPUC General Order 95 Rule 18.

[77] LSPGC, Event Reporting Procedure.

[78] LSPGC, Response to DR-004, Question 1, page 3.

[79] LSPGC, Response to DR-001, Question 2, page 4.

conditions in a timely manner. LSPGC's maintenance issue priority scale does not differentiate between the most critical conditions that require immediate action and those that may be addressed within up to four weeks. Though LSPGC stated that its priority zero conditions are mapped to the GO 95 Rule 18 Level 1 priority conditions, which requires the electrical corporation to take corrective action immediately[80], LSPGC's internal priority scale allows it to take up to four weeks to repair priority zero conditions. LSPGC must update its maintenance issue priority scale to distinguish between different conditions that accurately align with GO 95 Rule 18[81] in its next WMP Update.

See area for continued improvement LSPGC-26B-02 LSPGC Internal Priority Scale for Work Orders and Maintenance issues in Section 8.3.

8.2.6 Workforce Planning

LSPGC must ensure its field personnel are prepared to work safely in HFTD environments as it plans to energize the Fern Road Substation.

The Fern Road Substation, scheduled for energization in the first quarter of 2026, is located in the Tier 2 HFTD and represents LSPGC's area of greatest wildfire risk.[82] LSPGC stated that it will develop a HFTD-specific safety training program in the second quarter of 2026 and implement it in the first quarter of 2027.[83] All LSPGC field operations personnel accessing in the Tier 2 or higher HFTD areas will be required to complete this training (GD-06).[84]

While the development of an HFTD-specific training program demonstrates progress toward maturing workforce capabilities, having the planned implementation of the training occur after the energization of LSPGC's highest-risk asset may not prepare LSPGC field personnel in time to ensure workforce safety. To ensure that LSPGC field personnel are prepared to work safely in HFTD environments concurrent with system operations, LSPGC must provide information regarding its interim safety training in its next WMP Update.

See area for continued improvement LSPGC-26B-03 LSPGC HFTD Safety Training in Section 8.3.

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[80] CPUC General Order 95 Rule 18.

[81] CPUC General Order 95 Rule 18.

[82] LSPGC, 2026-2028 Base WMP R1, page 1.

[83] LSPGC, 2026-2028 Base WMP R1, page 85.

[84] LSPGC, 2026-2028 Base WMP R1, page 94.

8.3 Previous Areas for Continued Improvement

Energy Safety identifies no previous areas for continued improvement in the Grid Design, Operations, and Maintenance section for the LSPGC 2026-2028 Base WMP.

8.4 Areas for Continued Improvement for Future WMP Submissions

As discussed above, Energy Safety has identified areas pertaining to grid design, operations, and maintenance where the electrical corporation must demonstrate improvement in a future, specified WMP submission. This section sets forth the requirements for improvement.

8.4.1 LSPGC-26B-02. LSPGC Internal Priority Scale for Work Orders and Maintenance Issues

Summary: LSPGC's maintenance issue priority scale indicates LSPGC may take up to four weeks to repair priority zero conditions. Priority zero conditions are the most critical and may require immediate action. Further, LSPGC's priority zero conditions are mapped to GO 95 Rule 18 Level 1 priority, which requires immediate corrective actions.[85] LSPGC currently relies on, "built-in operational sentiment" to ensure that urgent or hazardous conditions are acted upon immediately.[86]

While LSPGC has stated that it has the programs and procedures to respond promptly to emergencies and hazardous conditions, LSPGC has not demonstrated that it has the internal maintenance tracking system to reflect that it is addressing critical conditions in an appropriate and timely manner.

Requirements: In its next WMP Update, LSPGC must:

- Provide an updated priority scale in LSPGC Table 8-3. Work Order Prioritization that explains each prioritization level, including a formal designation to distinguish conditions requiring immediate action from other priority zero conditions;
    - The updated priority scale must promote the safety of workers and the public and enable adequacy of service. The updated priority scale must identify when LSPGC must take corrective actions immediately, either by fully repairing the condition or temporarily repairing it and reclassifying the condition to a lower priority.[87]

[85] LSPGC, Response to DR-001, Question 2, page 5.

[86] LSPGC, Response to DR-001, Question 2, page 4.

[87] CPUC General Order 95 Rule 18.

- Provide a narrative explanation of the updated LSPGC maintenance issue priority scale. Explain any updates or changes to the priority scale.
- Provide maintenance documentation, asset management procedures, work order forms, inspection forms, or other equivalent documentation that reflects its updated priority scale.

Discussed in: Section 8.2.5 Work Orders

8.4.2 LSPGC-26B-03. LSPGC HFTD Safety Training

Summary: LSPGC reported that it will create the LSPGC HFTD safety training in the second quarter of 2026 and implement the training in the first quarter of 2027.[88] LSPGC noted that all LSPGC field operations personnel accessing facilities in the Tier 2+ HFTD will be required to complete the training (GD-06).[89] However, LSPGC stated that the Fern Road Substation, located within the Tier 2 HFTD, is scheduled for energization in the first quarter of 2026,[90] indicating that the planned implementation of the HFTD safety training program will occur after the energization of LSPGC's highest-risk asset.

Requirements: In its next WMP Update, LSPGC must:

- Provide a plan with milestones that describes the interim safety training for LSPGC field operations personnel accessing facilities in the Tier 2+ HFTD prior to the implementation of the LSPGC HFTD Safety Training.
- Provide a detailed list and copies of all interim safety training materials and documentation that LSPGC field operations personnel must complete or review to access facilities in the Tier 2+ HFTD.

Discussed in: Section 8.2.6 Workforce Planning

Appendix C provides a consolidated list of areas for continued improvement and requirements.

[88] LSPGC, 2026-2028 Base WMP R1, page 85.

[89] LSPGC, 2026-2028 Base WMP R1, page 94.

[90] LSPGC, 2026-2028 Base WMP R1, page 1.

9. Vegetation Management and Inspections

Chapter III, Section 9 of the WMP Guidelines requires the electrical corporation to include plans for vegetation management in its WMP. [91] The LSPGC 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

9.1 Summary of Anticipated Risk Reduction

The only vegetation management mitigation activity that LSPGC committed to implementing is its substation inspection program (VM-04).[92] These substation inspections focus on maintaining clearances within and around substations to limit fire risk from vegetation encroachment and to protect the facility from approaching wildfire, thereby providing risk reduction.[93] However, because LSPGC does not own or operate the transmission lines entering or leaving its currently operational substations, the inspections likely do not reduce ignition risk from its infrastructure.

LSPGC intends to energize transmission lines and additional substations within the 2026-2028 Base WMP cycle.[94] Some substations are projected to connect to transmission lines owned by LSPGC.[95] Inspections of those substations are likely to decrease wildfire risk. Additionally, programs that LSPGC must develop to inspect its future transmission lines are likely to decrease wildfire risk.

9.2 Discussion

This section discusses Energy Safety's evaluation of the vegetation management and inspections section of the LSPGC 2026-2028 Base WMP.

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[91] Pub. Util. Code §§ 8386(c)(3), (9).

[92] LSPGC, 2026-2028 Base WMP R1, pages 100-101.

[93] LSPGC, 2026-2028 Base WMP R1, pages 110-111.

[94] LSPGC, 2026-2028 Base WMP R1, pages 17-18.

[95] LSPGC, 2026-2028 Base WMP R1, pages 17-18.

9.2.1 Inspections

9.2.1.1 MVCD Inspection Frequency

LSPGC currently does not operate energized transmission lines but plans to energize transmission lines in 2028.[96] Once those lines are energized, LSPGC plans to perform minimum vegetation clearance distance (MVCD) inspections across all overhead, energized transmission line corridors.[97] In Section 9.2.1 and Table 9-3, LSPGC stated that the MVCD inspections will occur every 12 months and not-to-exceed 18 months[98,99] In response to a data request, LSPGC confirmed that the intended interval between inspections was 12-18 months rather than strictly annual inspections.[100]

Vegetation growth occurs annually and growth rates depend on unpredictable environmental conditions such as precipitation and temperature. Varying vegetation growth rates make predicting future vegetation clearance from transmission lines imprecise. Annual inspections of vegetation clearance are required to determine vegetation clearance conditions to meet regulatory requirements and identify hazards associated with annual vegetation growth.

It is not clear how LSPGC will effectively identify and mitigate vegetation clearance hazards and maintain regulatory compliance using MVCD inspections conducted with variable interval frequency. Additionally, LSPGC has not provided the criteria it will use to determine the frequency of inspections within that 12- to 18- month window. LSPGC must either conduct inspections on a true annual basis within a defined window (e.g., annual inspections will occur between March and May) or provide a clear explanation of how it will effectively identify and mitigate vegetation clearance hazards and maintain regulatory compliance with a variable 12- to 18-month inspection frequency in its next WMP Update.

See area for continued improvement LSPGC-26B-04 MVCD Inspection Frequency in Section 9.3.

9.2.1.2 Inspection Procedures

Vegetation clearance inspection procedures are required by the WMP Guidelines[101] and are necessary to ensure consistent, verifiable identification of vegetation clearance hazards. LSPGC stated that it has not yet finalized its vegetation clearance inspection procedures for

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[96] LSPGC, 2026-2028 Base WMP R1, pages 17-18.

[97] LSPGC, 2026-2028 Base WMP R1, page 102.

[98] LSPGC, 2026-2028 Base WMP R1, page 103.

[99] LSPGC, 2026-2028 Base WMP R1, pages 102.

[100] LSPGC, Response to DR-003, Question 1, page 2.

[101] WMP Guidelines, page 108.

its California transmission lines,[102] and LSPGC does not plan to conduct inspections until its transmission lines are energized.[103] LSPGC plans to energize its transmission lines in 2028.[104] Operating energized transmission lines without vegetation clearance inspection procedures in place may result in inconsistent vegetation clearance inspections and unidentified vegetation clearance risk. LSPGC must establish all relevant vegetation clearance inspection procedures before its transmission lines become energized and must provide these procedures in its next WMP Update.

See area for continued improvement LSPGC-26B-05 Vegetation Inspection Procedures in Section 9.3.

9.3 Previous Areas for Continued Improvement

Energy Safety identifies no previous areas for continued improvement in the Vegetation Management and Inspections section for the LSPGC 2026-2028 Base WMP.

9.4 Areas for Continued Improvement for Future WMP Submissions

As discussed above, Energy Safety has identified areas pertaining to vegetation management and inspections where the electrical corporation must demonstrate improvement in a future, specified WMP submission. This section sets forth the requirements for improvement.

9.4.1 LSPGC-26B-04. MVCD Inspection Frequency

Summary: Most electrical corporations operating in California inspect transmission lines for vegetation clearance annually. Annual inspections ensure electrical corporations identify hazards associated with seasonal vegetation growth. LSPGC plans to set the inspection frequency for its MVCD inspections to once every 12 to 18 months without explaining how LSPGC will determine inspection intervals or how LSPGC will identify hazards related to seasonal vegetation growth.[105,106] This variable frequency may not effectively identify and mitigate vegetation clearance hazards and ensure regulatory compliance.

Requirements: In its next WMP Update, LSPGC must either:

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[102] LSPGC, 2026-2028 Base WMP R1, page 103.

[103] LSPGC, 2026-2028 Base WMP R1, page 102.

[104] LSPGC, 2026-2028 Base WMP R1, pages 17-18.

[105] LSPGC, 2026-2028 Base WMP R1, pages 102-103.

[106] LSPGC, Response to DR-003, Question 1, page 2.

- Conduct the MVCD inspections at an annual cadence within a defined window (e.g., annual inspections will occur between March and May); and
- Set the MVCD inspections frequency to "annual" in Table 9-3 and throughout section 9.2.1 "Annual MVCD System Inspections."

OR:

- Explain how LSPGC will effectively identify and mitigate vegetation clearance hazards, and maintain regulatory compliance with MVCD inspections conducted with its 12 to 18-month variable interval frequency; and
- Provide the criteria and process LSPGC will use to determine its inspection frequency.

Discussed in: Section 9.2.1 Inspections

9.4.2 LSPGC-26B-05. Vegetation Inspection Procedures

Summary: LSPGC currently does not operate energized transmission lines but plans to energize transmission lines in 2028.[107] LSPGC is currently developing California-specific vegetation inspection procedures for its transmission lines.[108]

Requirements: In its next WMP Update, LSPGC must:

- Provide finalized procedures that LSPGC will use in its operation in California for the following activities:
  - Annual MVCD System Inspections, and
  - Detailed Ground Vegetation Evaluations.
- List these finalized procedures, including the version(s) and effective date(s), in sections 9.2.1.2 and 9.2.2.2 of its WMP, respectively, as required by the WMP Guidelines.[109]

Discussed in: Section 9.2.1 Inspections

Appendix C provides a consolidated list of areas for continued improvement and requirements.

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[107] LSPGC, 2026-2028 Base WMP R1, pages 17-18.

[108] LSPGC, 2026-2028 Base WMP R1, page 103.

[109] WMP Guidelines, page 108.

10. Situational Awareness and Forecasting

Chapter III, Section 10 of the WMP Guidelines requires the electrical corporation to include plans for situational awareness in its WMP.[110, 111] The LSPGC 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

10.1 Discussion

This section discusses Energy Safety's evaluation of the situational awareness section of the LSPGC 2026-2028 Base WMP.

10.1.1 Environmental Monitoring Systems

LSPGC's Installation and planned installation of weather stations will expand LSPGC's environmental monitoring network.

LSPGC stated it installed a weather station at its currently operating Orchard Substation, which was energized in 2025.[112] This installation provides LSPGC with real-time weather monitoring capabilities and localized data to inform wildfire emergency response.

LSPGC plans to install additional weather stations at the Fern Road Substation, which is expected to be energized in 2026, followed by installations of weather stations at Collinsville, Manning, Power the South Bay, and Power Clara Valley Substations as these substations are energized through 2028.[113] These planned installations demonstrate LSPGC's commitment to expanding its monitoring network in step with system growth.

10.1.2 Grid Monitoring Systems

Utilization and planned utilization of Supervisory Control and Data Acquisition (SCADA) grid monitoring systems at LSPGC's energized facility and future facilities as they are energized will assist LSPGC in monitoring its system at a greater capacity.

LSPGC stated its energized facility, Orchard Substation, utilizes SCADA monitoring systems to provide real-time operational visibility and control of its major components, including

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[110] Pub. Util. Code §§ 8386(c)(2)-(5).

[111] WMP Guidelines, pages 125-139.

[112] LSPGC, 2026-2028 Base WMP R1, page 127.

[113] LSPGC, 2026-2028 Base WMP R1, page 131.

breakers, disconnect switches, bus ties, and protection relays.[114] This enables early fault detection, equipment health assessment, and verification of proper protection system functionality within the substation.

As additional substations are energized, LSPGC plans to expand these capabilities by enabling real-time transformer monitoring, live video surveillance, fire alarm systems, and SCADA-based alarms.[115] These expansions will further improve system visibility and situational awareness.

10.1.3 Ignition Detection Systems

LSPGC's ignition detection system is sufficient given the limited scale of LSPGC's current operations and provides sufficient ignition detection coverage for its energized assets.

At its currently operating Orchard Substation, LSPGC stated it installed a weather station to support localized monitoring, utilizing 29 high-definition video surveillance cameras to monitor equipment areas and perimeter fence lines.[116] In addition, LSPGC installed hardwired fire alarm monitoring systems within each structure; these SCADA-based transformer temperature monitoring and alarm systems provide further ignition detection capability.[117] As additional substations are energized, LSPGC plans to install similar infrastructure at those sites.[118]

10.1.4 Weather Forecasting

LSPGC's weather forecasting approach is sufficient given LSPGC's current stage of operations and its plan to scale monitoring as its system grows.

LSPGC stated that there is no acceptable outage percentage for weather stations, as only one station is currently in operation.[119] In the event of an outage, LSPGC stated that it relies on nearby third-party weather stations and forecasting tools to maintain situational awareness of current and future weather conditions.[120] As additional substations are energized, LSPGC plans to install weather stations at those facilities.[121]

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[114] LSPGC, 2026-2028 Base WMP R1, page 132.

[115] LSPGC, 2026-2028 Base WMP R1, page 137.

[116] LSPGC, 2026-2028 Base WMP R1, page 138.

[117] LSPGC, 2026-2028 Base WMP R1, page 138.

[118] LSPGC, 2026-2028 Base WMP R1, page 138.

[119] LSPGC, 2026-2028 Base WMP R1, page 145.

[120] LSPGC, 2026-2028 Base WMP R1, page 145.

[121] LSPGC, 2026-2028 Base WMP R1, page 145.

10.1.5 Fire Potential Index

LSPGC's Fire Potential Index (FPI) approach is sufficient given LSPGC's limited operational footprint and demonstrates foresight in planning for broader system integration as its network expands.

LSPGC stated that it does not currently calculate its own FPI. Instead, it utilizes external forecasts provided by its third-party weather intelligence vendor, which provides site-specific forecasts including active fire, fire danger indices, and PSPS risk.[122] As additional substations are energized, LSPGC plans to integrate the third-party vendor's fire and PSPS forecasting outputs into its operational protocols across all substations and transmission lines.[123]

10.2 Areas for Continued Improvement

Energy Safety identifies no previous or new areas for continued improvement in the Situational Awareness and Forecasting section for the LSPGC 2026-2028 Base WMP.

[122] LSPGC, 2026-2028 Base WMP R1, pages 146-148.

[123] LSPGC, 2026-2028 Base WMP R1, page 148.

11. Emergency Preparedness, Collaboration, and Community Outreach

Chapter III, Section 11 of the WMP Guidelines requires the electrical corporation to provide an overview of its emergency plan and describe its communication strategy with public safety partners, essential customers, and other stakeholder groups regarding wildfires, outages due to wildfires, and PSPS and service restoration. [124] The LSPGC 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section. However, many of the specific requirements and subsections within this section are not applicable to ITOs, given the nature and scope of their operations.

11.1 Areas for Continued Improvement

Energy Safety identifies no previous or new areas for continued improvement in the Emergency Preparedness, Collaboration, and Community Outreach section for the LSPGC 2026-2028 Base WMP.

[124] Pub. Util. Code § 8386(c)(7), (11), (16), (19)-(21).

12. Enterprise Systems

Chapter III, Section 12 of the WMP Guidelines requires the electrical corporation to provide an overview of inputs to, operation of, and support for various enterprise systems it uses for vegetation management, asset management and inspection, grid monitoring, ignition detection, weather forecasting, and risk assessment initiatives. [125] The LSPGC 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

12.1 Discussion

This section discusses Energy Safety's evaluation of the enterprise systems section of the LSPGC 2026-2028 Base WMP.

LSPGC provided several qualitative targets in *Table 12-1 Enterprise Systems Targets* that demonstrate advancement of enterprise system capabilities. LSPGC plans to use a third-party enterprise asset management system to manage assets, inspections, and maintenance (GD-04), and asset identification occurs at commissioning, with all commissioned operational assets integrated into the enterprise system.[126]

As the vegetation management program expands, vegetation management data and inspection workflows are planned to be centralized and integrated into the third-party enterprise system (ENT-01).[127]

LSPGC also included grid monitoring (ENT-02) and ignition detection (SAF-02) activities to strengthen oversight through the third-party system and included risk assessment activity (ENT-03) to develop basic dashboards for inspections trends and risk prioritization.[128]

LSPGC stated that vegetation management at substations is already part of preventive maintenance and site inspections, and this program will expand to transmission lines when they are energized in late 2028, with all data captured in the third-party system.[129] LSPGC plans to integrate quality assurance and quality control activities into the third-party system, which LSPGC identified as the central enterprise system for its wildfire mitigation activities and capital planning.[130]

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[125] Pub. Util. Code § 8386(c)(10), (14), (18).

[126] LSPGC, 2026-2028 Base WMP R1, page 174.

[127] LSPGC, 2026-2028 Base WMP R1, page 174.

[128] LSPGC, 2026-2028 Base WMP R1, page 172.

[129] LSPGC, 2026-2028 Base WMP R1, page 174.

[130] LSPGC, 2026-2028 Base WMP R1, page 175.

LSPGC stated that it does not anticipate having transmission infrastructure in service prior to 2028, but LSPGC acknowledged potential vegetation management needs for transmission rights-of-way prior to commissioning.[131]

LSPGC's use of the enterprise system as the central enterprise system of record demonstrates a foundation for asset management, inspections, and quality assurance and quality control integration. Energy Safety finds these commitments sufficient for the current LSPGC's operational footprint.

12.2 Areas for Continued Improvement

Energy Safety identifies no previous or new areas for continued improvement in the Enterprise Systems section for the LSPGC 2026-2028 Base WMP.

[131] LSPGC, 2026-2028 Base WMP R1, pages 175-176.

13. Lessons Learned

Chapter III, Section 13 of the WMP Guidelines requires the electrical corporation to discuss the lessons learned it uses to drive continual improvement in its WMP. [132] The LSPGC 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

13.1 Discussion

This section discusses Energy Safety's evaluation of the lessons learned section of the LSPGC 2026-2028 Base WMP.

LSPGC provided two lessons learned impacting its 2026-2028 Base WMP. By incorporating these lessons learned, LSPGC may improve effectiveness, standardization, and long-term maturity of its wildfire mitigation efforts. For instance:

- LSPGC found that defensible space in HFTD is not one-size fits all and needs to account for safety, terrain, and project-specific design, and LSPGC plans to create a formal substation defensible space procedure.[133] By implementing it in 2026,[134] LSPGC could ensure that substation vegetation management is tailored to site-specific risks and operational requirements.
- LSPGC reported that contractor construction fire prevention plan (CFPP) drafts were often insufficient and required multiple rounds of feedback.[135] By establishing CFPP template requirements, planned to be implemented in late 2026,[136] LSPGC could standardize contractor submissions, reduce delays, and strengthen construction fire prevention plan.

13.2 Areas for Continued Improvement

Energy Safety identifies no previous or new areas for continued improvement in the Lessons Learned section for the LSPGC 2026-2028 Base WMP.

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[132] Pub. Util. Code §§ 8386(a) & (c)(5), (22).

[133] LSPGC, 2026-2028 Base WMP R1, page 178.

[134] LSPGC, 2026-2028 Base WMP R1, page 178.

[135] LSPGC, 2026-2028 Base WMP R1, page 178.

[136] LSPGC, 2026-2028 Base WMP R1, page 178.

14. Conclusion

14.1 Approval

The LSPGC 2026-2028 Wildfire Mitigation Plan is approved.

Catastrophic wildfires remain a serious threat to the health and safety of Californians. Electrical corporations, including LSPGC, must continue to make progress toward reducing wildfire risk.

Energy Safety expects LSPGC to effectively implement its wildfire mitigation activities to reduce wildfire and outage program risk.

LSPGC must meet the commitments in its approved WMP and address areas for continued improvement identified within this Decision to ensure it meaningfully reduces wildfire and outage program risk within its service territory over the plan cycle.

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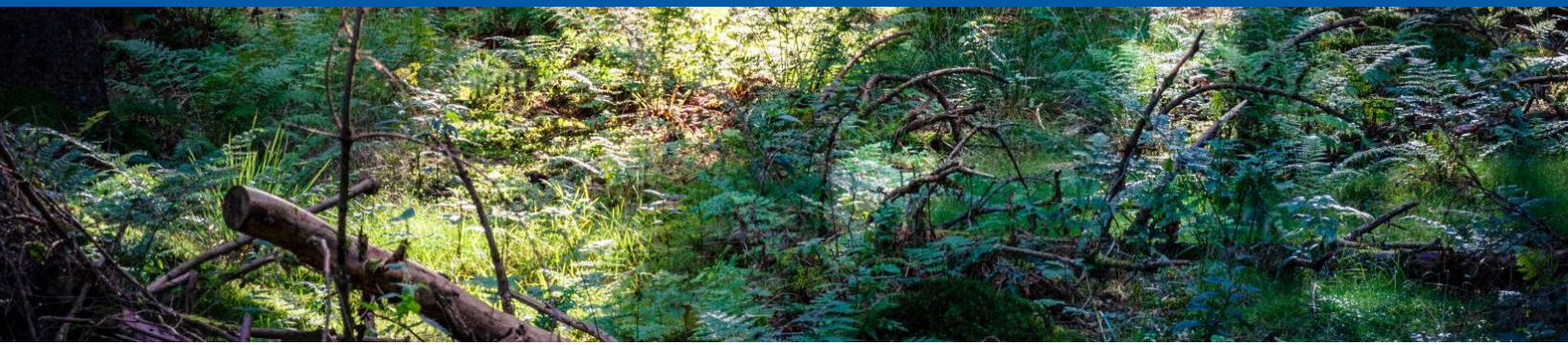
APPENDICES



APPENDICES

Appendix A. References Table

Citation	Reference
D.14-02-015	California Public Utilities Commission, Decision Adopting Regulations to Reduce the Fire Hazards Associated with Overhead Electric utility Facilities and Aerial Communication Facilities (D.14-02-015), Issued February 10, 2024, URL:(https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M087/K892/87892306.PDF).
Glossary of Wildland Fire	National Wildfire Coordinating Group, Glossary of Wildland Fire, Accessed May 13, 2024, URL:(https://www.nwcg.gov/node/439827).
Historical NWS Data	Iowa State University, Archived National Weather Service (NWS) Watch, Warnings, Advisories, Accessed April 8, 2025, URL:(https://mesonet.agron.iastate.edu/request/gis/watchwarn.phtml).
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Maturity Model	Office of Energy Infrastructure Safety, Electrical Corporation Wildfire Mitigation Maturity Model and Survey Guidelines, Published March 20, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58118&shareable=true).
Maturity Survey	Office of Energy Infrastructure Safety, Electrical Corporation Wildfire Mitigation Maturity Survey, Published March 20, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58119&shareable=true).
Pub. Res. Code § 4525.7	Public Resources Code section 4525.7, Added 1973, URL:(https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4525.7.&lawCode=PRC).

Citation	Reference
Pub. Util. Code § 8386	Public Utilities Code section 8386, Effective January 1, 2022, URL:(https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8386&lawCode=PUC).
Substantiating a Fire Model for a Given Application	Society of Fire Protection Engineers, Substantiating a Fire Model for a Given Application, Published 2010.
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Examples of State Environmental Requirements	Office of Energy infrastructure Safety, Examples of State Environmental Requirements, Accessed April 28, 2025, URL:(https://energysafety.ca.gov/wp-content/uploads/2025/04//examples-of-state-environmental-requirements.pdf).
LSPGC, 2026-2028 Base WMP	LS Power Grid California, LSPGC_2026-2028_Base-WMP_R0, Published July 25, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59027&shareable=true).
LSPGC, 2026-2028 Base WMP R1	LS Power Grid California, LSPGC_2026-2028_BASE-WMP_R1, Published November 21, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59764&shareable=true).
LSPGC, Substantive/Non-Substantive Errata	LS Power Grid California, LSPGC_2026-2028_BASE-WMP_R0_Redline, Published August 8, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59173&shareable=true).
LSPGC, Response to DR-001	LS Power Grid California, LSPGC_Response_OEIS-P-WMP_2025-LSP-001Q01-05, Published August 6, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59137&shareable=true).

Citation	Reference
LSPGC, Response to DR-003	LS Power Grid California, LSPGC_Response_OEIS-P-WMP_2025-LSP-003 Q01, Published August 6, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59207&shareable=true).
LSPGC, Response to DR-004	LS Power Grid California, LSPGC_Response_OEIS-P-WMP_2025-LSP-004 Q01, Published August 26, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59295&shareable=true).
CPUC General Order 95 Rule 18	California Public Utilities Commission, CPUC General Order 95 Rule 18, Published August 2009, 2025, URL:(https://ia.cpuc.ca.gov/gos/go95/go_95_rule_18.htm).
LSPGC, Event Reporting Procedure	LS Power Grid California, LSPG[C] EOP-004 Event Reporting v5, Published August 26, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59296&shareable=true).

Appendix B. Status of Previous Areas for Continued Improvement

Energy Safety Decision for the LSPGC 2025 WMP Update did not identify any areas for continued improvement.

Appendix C. Consolidated List of Areas for Continued Improvement and Requirements

The list below consolidates all LSPGC's areas for continued improvement and requirements that LSPGC must address in future WMPs.

Risk Methodology and Assessment

LSPGC-26B-01. Components of Wildfire Risk in Wildfire Risk Assessment

Summary: As part of its 2026-2028 Base WMP, LSPGC has initiated a wildfire risk assessment.[1] LSPGC's quantitative, semi-probabilistic risk modeling demonstrates a proactive approach to wildfire risk analysis, undertaken in advance of planned system expansions, highlighting LSPGC's commitment to anticipating and mitigating potential risks. LSPGC's overall utility risk is currently solely comprised of wildfire risk, which only considers wildfire consequence.[2] In its current risk model, LSPGC does not incorporate ignition likelihood, wildfire likelihood, or burn likelihood.[3] Given the nature of LSPGC's current operational and planned assets, these risk components could provide insights into LSPGC's risk profile.

Requirements: In its next WMP Update, LSPGC must:

- Provide an evaluation of the ignition risk drivers on LSPGC's assets, including:
  - A list of potential asset failures,
  - An evaluation of the likelihood of each of the listed failures occurring based on historical data (internal or external), and
  - An evaluation of the likelihood of each of the listed failures leading to a spark or ignition.

[1] LSPGC, 2026-2028 Base WMP R1, page 25.

[2] LSPGC, 2026-2028 Base WMP R1, pages 26-27.

[3] LSPGC, 2026-2028 Base WMP R1, pages 26-27.

- Provide an evaluation of the likelihood of a spark or ignition from an LSPGC asset propagating into a wildfire, including assessments of the impact of each of the following on risk:
    - Location of the asset,
    - Nearby fuels, and
    - Weather conditions.
- Provide a plan with milestones for incorporating calculated wildfire likelihood, burn likelihood, and ignition likelihood into its wildfire risk assessment.

Discussed in: Section 5.1.1 Risk Analysis Framework

Grid Design, Operations, and Maintenance

LSPGC-26B-02. LSPGC Internal Priority Scale for Work Orders and Maintenance Issues

Summary: LSPGC's maintenance issue priority scale indicates LSPGC may take up to four weeks to repair priority zero conditions. Priority zero conditions are the most critical and may require immediate action. Further, LSPGC's priority zero conditions are mapped to GO 95 Rule 18 Level 1 priority, which requires immediate corrective actions.[4] LSPGC currently relies on, "built-in operational sentiment" to ensure that urgent or hazardous conditions are acted upon immediately.[5]

While LSPGC has stated that it has the programs and procedures to respond promptly to emergencies and hazardous conditions, LSPGC has not demonstrated that it has the internal maintenance tracking system to reflect that it is addressing critical conditions in an appropriate and timely manner.

Requirements: In its next WMP Update, LSPGC must:

- Provide an updated priority scale in LSPGC Table 8-3. Work Order Prioritization that explains each prioritization level, including a formal designation to distinguish conditions requiring immediate action from other priority zero conditions;
    - The updated priority scale must promote the safety of workers and the public and enable adequacy of service. The updated priority scale must identify when LSPGC must take corrective actions immediately, either by fully repairing the condition or temporarily repairing it and reclassifying the condition to a lower priority. [6]

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[4] LSPGC, Response to DR-001, Question 2, page 5.

[5] LSPGC, Response to DR-001, Question 2, page 4.

[6] CPUC General Order 95 Rule 18.

- Provide a narrative explanation of the updated LSPGC maintenance issue priority scale. Explain any updates or changes to the priority scale.
- Provide maintenance documentation, asset management procedures, work order forms, inspection forms, or other equivalent documentation that reflects its updated priority scale.

Discussed in: Section 8.2.5 Work Orders

LSPGC-26B-03. LSPGC HFTD Safety Training

Summary: LSPGC reported that it will create the LSPGC HFTD safety training in the second quarter of 2026 and implement the training in the first quarter of 2027.[7] LSPGC noted that all LSPGC field operations personnel accessing facilities in the Tier 2+ HFTD will be required to complete the training (GD-06).[8] However, LSPGC stated that the Fern Road Substation, located within the Tier 2 HFTD, is scheduled for energization in the first quarter of 2026,[9] indicating that the planned implementation of the HFTD safety training program will occur after the energization of LSPGC's highest-risk asset.

Requirements: In its next WMP Update, LSPGC must:

- Provide a plan with milestones that describes the interim safety training for LSPGC field operations personnel accessing facilities in the Tier 2+ HFTD prior to the implementation of the LSPGC HFTD Safety Training.
- Provide a detailed list and copies of all interim safety training materials and documentation that LSPGC field operations personnel must complete or review to access facilities in the Tier 2+ HFTD.

Discussed in: Section 8.2.6 Workforce Planning

Vegetation Management and Inspections

LSPGC-26B-04. MVCD Inspection Frequency

Summary: Most electrical corporations operating in California inspect transmission lines for vegetation clearance annually. Annual inspections ensure electrical corporations identify hazards associated with seasonal vegetation growth. LSPGC plans to set the inspection frequency for its MVCD inspections to once every 12 to 18 months without explaining how LSPGC will determine inspection intervals or how LSPGC will identify hazards related to

[7] LSPGC, 2026-2028 Base WMP R1, page 85.

[8] LSPGC, 2026-2028 Base WMP R1, page 94.

[9] LSPGC, 2026-2028 Base WMP R1, page 1.

seasonal vegetation growth.[10,11] This variable frequency may not effectively identify and mitigate vegetation clearance hazards and ensure regulatory compliance.

Requirements: In its next WMP Update, LSPGC must either:

- Conduct the MVCD inspections at an annual cadence within a defined window (e.g., annual inspections will occur between March and May); and
- Set the MVCD inspections frequency to "annual" in Table 9-3 and throughout section 9.2.1 "Annual MVCD System Inspections."

OR:

- Explain how LSPGC will effectively identify and mitigate vegetation clearance hazards, and maintain regulatory compliance with MVCD inspections conducted with its 12 to 18-month variable interval frequency; and
- Provide the criteria and process LSPGC will use to determine its inspection frequency.

Discussed in: Section 9.2.1 Inspections

LSPGC-26B-05. Vegetation Inspection Procedures

Summary: LSPGC currently does not operate energized transmission lines but plans to energize transmission lines in 2028.[12] LSPGC is currently developing California-specific vegetation inspection procedures for its transmission lines.[13]

Requirements: In its next WMP Update, LSPGC must:

- Provide finalized procedures that LSPGC will use in its operation in California for the following activities:
    - Annual MVCD System Inspections, and
    - Detailed Ground Vegetation Evaluations.
- List these finalized procedures, including the version(s) and effective date(s), in sections 9.2.1.2 and 9.2.2.2 of its WMP, respectively, as required by the WMP Guidelines.[14]

Discussed in: Section 9.2.1 Inspections

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[10] LSPGC, 2026-2028 Base WMP R1, pages 102-103.

[11] LSPGC, Response to DR-003, Question 1, page 2.

[12] LSPGC, 2026-2028 Base WMP R1, pages 17-18.

[13] LSPGC, 2026-2028 Base WMP R1, page 103.

[14] WMP Guidelines, page 108.

Appendix D.
Maturity Survey Results

The Energy Safety Electrical Corporation Wildfire Mitigation Maturity Model (Maturity Model) and 2025 Electrical Corporation Wildfire Mitigation Maturity Survey (Maturity Survey) together provide a quantitative method to assess electrical corporation wildfire risk mitigation capabilities and examine how electrical corporations propose to continuously improve in key areas of their WMP.

The Maturity Model consists of 38 individual capabilities, each relevant to an electrical corporation's ability to mitigate wildfire and PSPS risk within its service territory. Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). The 38 capabilities are aggregated into seven categories. The seven categories are:

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

LSPGC's responses to the Maturity Survey, listed by category, are depicted in the figure below.

Figure D-1. LSPGC 2025 Responses to the Maturity Survey

		1. Capability				2. Capability				3. Capability				4. Capability				5. Capability				6. Capability			
		2025	2026	2027	2028	2025	2026	2027	2028	2025	2026	2027	2028	2025	2026	2027	2028	2025	2026	2027	2028	2025	2026	2027	2028
A. Risk Assessment and Mitigation Strategy		1. Statistical weather, climate, and wildfire modeling				2. Calculation of wildfire and PSPS hazard and exposure to societal values				3. Calculation of community vulnerability to wildfire and PSPS				4. Calculation of risk and risk components				5. Risk event tracking and integration of lessons learned				6. Risk-informed wildfire mitigation strategy			
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	0.0	0.0	0.0	0.0
	Average of Sub-Cap.	0.4	0.8	1.1	1.2	0.1	0.4	0.7	0.9	0.0	0.3	0.3	0.3	0.1	0.4	0.5	0.5	0.3	0.9	0.9	1.3	0.0	0.6	0.6	0.6
B. Situational Awareness and Forecasting		7. Ignition likelihood estimation				8. Weather forecasting ability				9. Wildfire spread forecasting				10. Data collection for near-real-time conditions				11. Wildfire detection and alarm systems				12. Centralized monitoring of real-time conditions			
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	0.0	0.0	0.0	0.0
	Average of Sub-Cap.	0.1	0.2	0.3	0.4	0.4	0.5	0.5	0.5	0.1	0.3	0.3	0.3	0.7	0.7	1.0	1.1	0.0	0.5	1.0	1.0	0.8	1.0	1.0	1.0
C. Grid Design, Inspections, and Maintenance		13. Asset inventory and condition database				14. Asset inspections				15. Asset maintenance and repair				16. Grid design and resiliency				17. Asset and grid personnel training and quality							
	Minimum of Sub-Cap.	0.0	0.0	1.0	1.0	0.0	1.0	1.0	1.0	0.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0				
	Average of Sub-Cap.	0.5	0.8	1.3	1.3	0.7	1.0	1.0	1.3	0.5	1.3	1.3	1.3	0.3	0.5	0.5	0.7	0.3	0.8	0.8	0.8				
D. Vegetation Management and Inspections		18. Vegetation inventory				19. Vegetation inspections				20. Vegetation treatment				21. Vegetation personnel training and quality				22. Best Management Practices for Transmission Rights-Of-Ways (ROWs)							
	Minimum of Sub-Cap.	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	0.0	0.0	0.0	0.0				
	Average of Sub-Cap.	2.0	2.0	2.0	2.5	1.3	1.3	1.3	1.3	0.7	0.7	0.7	1.0	0.5	0.5	0.5	1.0	0.8	0.8	0.8	0.8				
E. Grid Operations and Protocols		23. Protective equipment and device settings				24. Incorporation of ignition risk factors in grid control				25. PSPS operating model				26. Protocols for PSPS re-energization				27. Ignition prevention and suppression							
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	1.0	1.0				
	Average of Sub-Cap.	0.7	1.0	1.0	1.2	0.8	0.8	0.8	1.2	1.3	1.3	1.3	2.0	1.3	1.3	1.3	1.3	2.0	2.0	2.0	2.0				
F. Emergency Preparedness		28. Wildfire and PSPS emergency & disaster preparedness plan				29. Collaboration and coordination with public safety partners				30. Public emergency communication strategy				31. Preparedness and planning for service restoration				32. Customer support in wildfire and PSPS emergencies				33. Learning after wildfires and PSPS events			
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Average of Sub-Cap.	0.5	0.8	0.8	0.8	0.0	0.0	0.0	0.0	0.8	0.8	0.8	0.8	1.2	1.3	1.5	1.7	0.0	0.0	0.0	0.0	0.5	0.5	0.5	0.5
G. Community Outreach and Engagement		34. Public outreach and education awareness				35. Public engagement in electrical corporation wildfire mitigation planning				36. Engagement with AFN and socially vulnerable populations				37. Collaboration on local wildfire mitigation planning				38. Cooperation and best practice sharing with other electrical corporations							
	Minimum of Sub-Cap.	0.0	0.0	0.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0				
	Average of Sub-Cap.	0.0	0.0	0.0	1.0	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.3	0.3	1.0				

Appendix E. Definitions

Unless otherwise expressly stated, the following words and terms, for the purposes of this Decision, have the meanings shown in this chapter.

Terms Defined in Other Codes

Where terms are not defined in this Decision and are defined in the Government Code, Public Utilities Code, or Public Resources Code, such terms have the meanings ascribed to them in those codes.

Terms Not Defined

Where terms are not defined through the methods authorized by this section, such terms have ordinarily accepted meanings such as the context implies.

Definition of Terms

Term	Definition
Access and functional needs population (AFN)	Individuals, including, but not limited to, those who have developmental or intellectual disabilities, physical disabilities, chronic conditions, or injuries; who have limited English proficiency or are non-English speaking; who are older adults, children, or people living in institutionalized settings; or who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or are pregnant. (Gov. Code, § 8593.3(f)(1).)
Asset (utility)	Electric lines, equipment, or supporting hardware.
Benchmarking	A comparison between one electrical corporation's protocols, technologies used, or mitigations implemented, and other electrical corporations' similar endeavors.
Burn likelihood	The likelihood that a wildfire with an ignition point will burn at a specific location within the service territory based on a probabilistic set of weather profiles, vegetation, and topography.

Term	Definition
Catastrophic wildfire	A fire that caused at least one death, damaged over 500 structures, or burned over 5,000 acres.
Circuit miles	The total length in miles of separate transmission and/or distribution circuits, regardless of the number of conductors used per circuit (i.e., different phases).
Circuit segment	A specific portion of an electrical circuit that can be separated or disconnected from the rest of the system without affecting the operation of other parts of the network. This isolation is typically achieved using switches, circuit breakers, or other control mechanisms.
Consequence	The adverse effects from an event, considering the hazard intensity, community exposure, and local vulnerability.
Contact from object ignition likelihood	The likelihood that a non-vegetative object (such as a balloon or vehicle) will contact utility-owned equipment and result in an ignition.
Contact from vegetation likelihood of ignition	The likelihood that vegetation will contact utility-owned equipment and result in an ignition.
Contractor	Any individual in the temporary and/or indirect employ of the electrical corporation whose limited hours and/or time-bound term of employment are not considered “full-time” for tax and/or any other purposes.
Critical facilities and infrastructure	Facilities and infrastructure that are essential to public safety and that require additional assistance and advance planning to ensure resiliency during PSPS events. These include the following: Emergency services sector: • Police stations • Fire stations • Emergency operations centers

Term	Definition
	• Public safety answering points (e.g., 9-1-1 emergency services) Government facilities sector: • Schools • Jails and prisons Health care and public health sector: • Public health departments • Medical facilities, including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers, and hospice facilities (excluding doctors' offices and other non-essential medical facilities) Energy sector: • Public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, interconnected publicly owned electrical corporations and electric cooperatives • Water and wastewater systems sector: • Facilities associated with provision of drinking water or processing of wastewater, including facilities that pump, divert, transport, store, treat, and deliver water or wastewater Communications sector: • Communication carrier infrastructure, including selective routers, central offices, head ends, cellular switches, remote terminals, and cellular sites Chemical sector: • Facilities associated with manufacturing, maintaining, or distributing hazardous materials and chemicals (including Category N-Customers as defined in D.01-06-085) Transportation sector:

Term	Definition
	• Facilities associated with transportation for civilian and military purposes: automotive, rail, aviation, maritime, or major public transportation (D.19-05-042 and D.20-05-051)
Customer hours	Total number of customers, multiplied by average number of hours (e.g., of power outage).
Dead fuel moisture	The moisture content of dead organic fuels, expressed as a percentage of the oven dry weight of the sample, that is controlled entirely by exposure to environmental conditions.
Detailed inspection	In accordance with General Order (GO) 165, an inspection where individual pieces of equipment and structures are carefully examined, visually and through routine diagnostic testing, as appropriate, and (if practical and if useful information can be so gathered) opened, and the condition of each is rated and recorded.
Disaster	A serious disruption of the functioning of a community or a society at any scale due to hazardous events interacting with conditions of exposure, vulnerability, and capacity, leading to one or more of the following: human, material, economic, and environmental losses and impacts. The effect of the disaster can be immediate and localized but is often widespread and could last a long time. The effect may test or exceed the capacity of a community or society to cope using its own resources. Therefore, it may require assistance from external sources, which could include neighboring jurisdictions or those at the national or international levels. (United Nations Office for Disaster Risk Reduction [UNDRR].)
Discussion-based exercise	Exercise used to familiarize participants with current plans, policies, agreements, and procedures or to develop new plans, policies, agreements, and procedures. Often includes seminars, workshops, tabletop exercises, and games.
Electrical corporation	Every corporation or person owning, controlling, operating, or managing any electric plant for compensation within California,

Term	Definition
	except where the producer generates electricity on or distributes it through private property solely for its own use or the use of its tenants and not for sale or transmission to others.
Emergency	Any incident, whether natural, technological, or human caused, that requires responsive action to protect life or property but does not result in serious disruption of the functioning of a community or society. (FEMA/UNDRR.)
Enhanced inspection	Inspection whose frequency and thoroughness exceed the requirements of a detailed inspection, particularly if driven by risk calculations.
Equipment caused ignition likelihood	The likelihood that utility-owned equipment will cause an ignition through either normal operation (such as arcing) or failure.
Exercise	An instrument to train for, assess, practice, and improve performance in prevention, protection, response, and recovery capabilities in a risk-free environment. (FEMA.)
Exposure	The presence of people, infrastructure, livelihoods, environmental services and resources, and other high-value assets in places that could be adversely affected by a hazard.
Fire hazard index	A numerical rating for specific fuel types, indicating the relative probability of fires starting and spreading, and the probable degree of resistance to control; similar to burning index, but without effects of wind speed.[15]
Fire potential index (FPI)	Landscape scale index used as a proxy for assessing real-time risk of a wildfire under current and forecasted weather conditions.
Fire season	The time of year when wildfires are most likely for a given geographic region due to historical weather conditions, vegetative characteristics, and impacts of climate change. Each electrical corporation defines the fire season(s) across its service

[15] Glossary of Wildland Fire.

Term	Definition
	territory based on a recognized fire agency definition for the specific region(s) in California.
Fireline intensity	The rate of heat release per unit time per unit length of fire front. Numerically, it is the product of the heat yield, the quantity of fuel consumed in the fire front, and the rate of spread.[16]
Frequency	The anticipated number of occurrences of an event or hazard over time.
Frequent PSPS events	Three or more PSPS events per calendar year per line circuit.
Fuel continuity	The degree or extent of continuous or uninterrupted distribution of fuel particles in a fuel bed thus affecting a fire's ability to sustain combustion and spread. This applies to aerial fuels as well as surface fuels.[17]
Fuel density	Mass of fuel (vegetation) per area that could combust in a wildfire.
Fuel management	Act or practice of controlling flammability and reducing resistance to control of wildland fuels through mechanical, chemical, biological, or manual means, or by fire, in support of land management objectives.[18]
Fuel moisture content	Amount of moisture in a given mass of fuel (vegetation), measured as a percentage of its dry weight.
Full-time employee (FTE)	Any individual in the ongoing and/or direct employ of the electrical corporation whose hours and/or term of employment are considered “full-time” for tax and/or any other purposes.

[16] Glossary of Wildland Fire.

[17] Glossary of Wildland Fire.

[18] Glossary of Wildland Fire.

Term	Definition
GO 95 nonconformance	Condition of a utility asset that does not meet standards established by GO 95.
Grid hardening	Actions (such as equipment upgrades, maintenance, and planning for more resilient infrastructure) taken in response to the risk of undesirable events (such as outages) or undesirable conditions of the electrical system to reduce or mitigate those events and conditions, informed by an assessment of the relevant risk drivers or factors.
Grid topology	General design of an electric grid, whether looped or radial, with consequences for reliability and ability to support PSPS (e.g., ability to deliver electricity from an additional source).
Hazard	A condition, situation, or behavior that presents the potential for harm or damage to people, property, the environment, or other valued resources.
Hazard tree	A tree that is, or has portions that are, dead, dying, rotten, diseased, or otherwise has a structural defect that may fail in whole or in part and damage utility facilities should it fail
High Fire Threat District (HFTD)	Areas of the state designated by the CPUC as having elevated wildfire risk, where each utility must take additional action (per GO 95, GO 165, and GO 166) to mitigate wildfire risk. (D.17-01-009.)
High Fire Risk Area (HFRA)	Areas that the electrical corporation has deemed at high risk from wildfire, independent of HFTD designation.
Highly rural region	Area with a population of less than seven persons per square mile, as determined by the United States Bureau of the Census. For purposes of the WMP, “area” must be defined as a census tract.

Term	Definition
High-risk species	Species of vegetation that (1) have a higher risk of either coming into contact with powerlines or causing an outage or ignition, or (2) are easily ignitable and within close proximity to potential arcing, sparks, and/or other utility equipment thermal failures. The status of species as "high-risk" must be a function of species-specific characteristics, including growth rate; failure rates of limbs, trunk, and/or roots (as compared to other species); height at maturity; flammability; and vulnerability to disease or insects.
High wind warning (HWW)	Level of wind risk from weather conditions, as declared by the National Weather Service (NWS). For historical NWS data, refer to the Iowa State University archive of NWS watches/warnings.
HWW overhead (OH) circuit mile day	Sum of OH circuit miles of utility grid subject to a HWW each day within a given time period, calculated as the number of OH circuit miles under a HWW multiplied by the number of days those miles are under said HWW. For example, if 100 OH circuit miles are under a HWW for one day, and 10 of those miles are under the HWW for an additional day, then the total HWW OH circuit mile days would be 110.
Ignition likelihood	The total anticipated annualized number of ignitions resulting from electrical corporation-owned assets at each location in the electrical corporation's service territory. This considers probabilistic weather conditions, type and age of equipment, and potential contact of vegetation and other objects with electrical corporation assets. This should include the use of any method used to reduce the likelihood of ignition. For example, the use of protective equipment and device settings (PEDS) to reduce the likelihood of an ignition upon an initiating event.
Incident command system (ICS)	A standardized on-scene emergency management concept specifically designed to allow its user(s) to adopt an integrated organizational structure equal to the complexity and demands of single or multiple incidents, without being hindered by jurisdictional boundaries.
Initiative activity	See mitigation activity.

Term	Definition
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 activities undertaken by the electrical corporation pursuant to a WMP initiative in a given compliance period.
Level 1 finding	In accordance with GO 95, an immediate safety and/or reliability risk with high probability for significant impact.
Level 2 finding	In accordance with GO 95, a variable safety and/or reliability risk (non-immediate and with high to low probability for significant impact).
Level 3 finding	In accordance with GO 95, an acceptable safety and/or reliability risk.
Limited English proficiency (LEP) population	Population with limited English working proficiency based on the International Language Roundtable scale.
Line miles	The number of miles of transmission and/or distribution conductors, including the length of each phase and parallel conductor segment.
Live fuel moisture content	Moisture content within living vegetation, which can retain water longer than dead fuel.
Locally relevant	In disaster risk management, generally understood as the cope at which disaster risk strategies and initiatives are considered the most effective at achieving desired outcomes. This tends to be the level closest to impacting residents and communities, reducing existing risks, and building capacity, knowledge, and normative support. Locally relevant scales, conditions, and perspectives depend on the context of application.
Match-drop simulation	Wildfire simulation method forecasting propagation and consequence/impact based on an arbitrary ignition.

Term	Definition
Memorandum of Agreement (MOA)	A document of agreement between two or more agencies establishing reciprocal assistance to be provided upon request (and if available from the supplying agency) and laying out the guidelines under which this assistance will operate. It can also be a cooperative document in which parties agree to work together on an agreed-upon project or meet an agreed objective.
Mitigation	Undertakings to reduce the loss of life and property from natural and/or human-caused disasters by avoiding or lessening the impact of a disaster and providing value to the public by creating safer communities. Encompasses mitigation categories, mitigation initiatives, and mitigation activities within the WMP.
Mitigation activity	A measure that contributes to or accomplishes a mitigation initiative designed to reduce the consequences and/or probability of 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.
Model uncertainty	The amount by which a calculated value might differ from the true value when the input parameters are known (i.e., limitation of the model itself based on assumptions).[19]

[19] Adapted from: Substantiating a Fire Model for a Given Application.

Term	Definition
Mutual aid	Voluntary aid and assistance by the provision of services and facilities, including but not limited to electrical corporations, communication, and transportation. Mutual aid is intended to provide adequate resources, facilities, and other support to an electrical corporation whenever its own resources prove inadequate to cope with a given situation.
National Incident Management System (NIMS)	A systematic, proactive approach to guide all levels of government, nongovernment organizations, and the private sector to work together to prevent, protect against, mitigate, respond to, and recover from the effects of incidents. NIMS provides stakeholders across the whole community with the shared vocabulary, systems, and processes to successfully deliver the capabilities described in the National Preparedness System. NIMS provides a consistent foundation for dealing with all incidents, ranging from daily occurrences to incidents requiring a coordinated federal response.
Operations-based exercise	Type of exercise that validates plans, policies, agreements, and procedures; clarifies roles and responsibilities; and identifies resource gaps in an operational environment. Often includes drills, functional exercises (FEs), and full-scale exercises (FSEs).
Outage program risk	The measure of reliability impacts from wildfire mitigation related outages at a given location.
Overall utility risk	The comprehensive risk due to both wildfire and PSPS incidents across a utility's territory; the aggregate potential of adverse impacts to people, property, critical infrastructure, or other valued assets in society.
Overall utility risk, PSPS risk	See Outage program risk.
Parameter uncertainty	The amount by which a calculated value might differ from the true value based on unknown input parameters. (Adapted from Society of Fire Protection Engineers [SFPE] guidance.)

Term	Definition
Patrol inspection	In accordance with GO 165, a simple visual inspection of applicable utility equipment and structures designed to identify obvious structural problems and hazards. Patrol inspections may be carried out in the course of other company business.
Performance metric	A quantifiable measurement that is used by an electrical corporation to indicate the extent to which its WMP is driving performance outcomes.
Population density	Population density is calculated using the American Community Survey (ACS) one-year estimate for the corresponding year or, for years with no such ACS estimate available, the estimate for the immediately preceding year.
Preparedness	A continuous cycle of planning, organizing, training, equipping, exercising, evaluating, and taking corrective action in an effort to ensure effective coordination during incident response. Within the NIMS, preparedness focuses on planning, procedures and protocols, training and exercises, personnel qualification and certification, and equipment certification.
Priority essential services	Critical first responders, public safety partners, critical facilities and infrastructure, operators of telecommunications infrastructure, and water electrical corporations/agencies.
Property	Private and public property, buildings and structures, infrastructure, and other items of value that may be destroyed by wildfire, including both third-party property and utility assets.
Protective equipment and device settings (PEDS)	The electrical corporation's procedures for adjusting the sensitivity of grid elements to reduce wildfire risk, other than automatic reclosers (such as circuit breakers, switches, etc.). For example, PG&E's "Enhanced Powerline Safety Settings" (EPSS).
PEDS outage consequence	The total anticipated adverse effects from an outage occurring while increased sensitivity settings on a protective device are enabled at a specific location, including reliability and associated safety impacts.

Term	Definition
PEDS outage exposure potential	The potential physical, social, or economic impact of an outage occurring when PEDS are enabled on people, property, critical infrastructure, livelihoods, health, local economies, and other high-value assets.
PEDS outage likelihood	The likelihood of an outage occurring while increased sensitivity settings on a protective device are enabled at a specific location given a probabilistic set of environmental conditions.
PEDS outage risk	The total expected annualized impacts from PEDS enablement at a specific location.
PEDS outage vulnerability	The susceptibility of people or a community to adverse effects of an outage occurring when PEDS are enabled, including all characteristics that influence their capacity to anticipate, cope with, resist, and recover from the related adverse effects (e.g., high AFN population, poor energy resiliency, low socioeconomics).
PSPS consequence	The total anticipated adverse effects of a PSPS for a community. This considers the PSPS exposure potential and inherent PSPS vulnerabilities of communities at risk.
PSPS event	The period from notification of the first public safety partner of a planned public safety PSPS to re-energization of the final customer.
PSPS exposure potential	The potential physical, social, or economic impact of a PSPS event on people, property, critical infrastructure, livelihoods, health, local economies, and other high-value assets.
PSPS likelihood	The likelihood of an electrical corporation requiring a PSPS given a probabilistic set of environmental conditions.
PSPS risk	The total expected annualized impacts from PSPS at a specific location. This considers two factors: (1) the likelihood a PSPS will be required due to environmental conditions exceeding design conditions, and (2) the potential consequences of the PSPS for

Term	Definition
	each affected community, considering exposure potential and vulnerability.
PSPS vulnerability	The susceptibility of people or a community to adverse effects of a PSPS event, including all characteristics that influence their capacity to anticipate, cope with, resist, and recover from the adverse effects of a PSPS event (e.g., high AFN population, poor energy resiliency, low socioeconomics).
Public safety partners	First/emergency responders at the local, state, and federal levels; water, wastewater, and communication service providers; community choice aggregators (CCAs); affected publicly owned electrical corporations/electrical cooperatives; tribal governments; Energy Safety; the Commission; the California Office of Emergency Services; and CAL FIRE.
Qualitative target	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.
Quantitative 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 data submissions and WMP Updates.
RFW OH circuit mile day	Sum of OH circuit miles of utility grid subject to RFW each day within a given time period, calculated as the number of OH circuit miles under RFW multiplied by the number of days those miles are under said RFW. For example, if 100 OH circuit miles are under RFW for one day, and 10 of those miles are under RFW for an additional day, then the total RFW OH circuit mile days would be 110.

Term	Definition
Risk	A measure of the anticipated adverse effects from a hazard considering the consequences and frequency of the hazard occurring. [20]
Risk component	A part of an electric corporation's risk analysis framework used to determine overall utility risk.
Risk evaluation	The process of comparing the results of a risk analysis with risk criteria to determine whether the risk and/or its magnitude is acceptable or tolerable. (ISO 31000:2009.)
Risk event	An event with probability of ignition, such as wire down, contact with objects, line slap, event with evidence of heat generation, or other event that causes sparking or has the potential to cause ignition. The following all qualify as risk events: • Ignitions • Outages not caused by vegetation • Outages caused by vegetation • Wire-down events • Faults • Other events with potential to cause ignition
Risk management	Systematic application of management policies, procedures, and practices to the tasks of communication, consultation, establishment of context, and identification, analysis, evaluation, treatment, monitoring, and review of risk. (ISO 31000.)
Rule	Section of Public Utilities Code requiring a particular activity or establishing a particular threshold.
Rural region	In accordance with GO 165, area with a population of less than 1,000 persons per square mile, as determined by the U.S. Bureau of the Census. For purposes of the WMP, "area" must be defined as a census tract.

[20] Adapted from: Introduction to International Disaster Management.

Term	Definition
Seminar	An informal discussion, designed to orient participants to new or updated plans, policies, or procedures (e.g., to review a new external communications standard operating procedure).
Sensitivity analysis	Process used to determine the relationships between the uncertainty in the independent variables ("input") used in an analysis and the uncertainty in the resultant dependent variables ("output"). (SFPE guidance.)
Situational Awareness	An on-going process of gathering information by observation and by communication with others. This information is integrated to create an individual's perception of a given situation.[21]
Slash	Branches or limbs less than four inches in diameter, and bark and split products debris left on the ground as a result of utility vegetation management. [22]
Span	The space between adjacent supporting poles or structures on a circuit consisting of electric lines and equipment. "Span level" refers to asset-scale granularity.
Tabletop exercise (TTX)	A discussion-based exercise intended to stimulate discussion of various issues regarding a hypothetical situation. Tabletop exercises can be used to assess plans, policies, and procedures or to assess types of systems needed to guide the prevention of response to, or recovery from a defined incident.
Trees with strike potential	Trees that could either, in whole or in part, "fall in" to a power line or have portions detach and "fly in" to contact a power line in high-wind conditions.
Uncertainty	The amount by which an observed or calculated value might differ from the true value. For an observed value, the difference is

[21] Glossary of Wildland Fire.

[22] Pub. Res. Code § 4525.7.

Term	Definition
	"experimental uncertainty"; for a calculated value, it is "model" or "parameter uncertainty." (Adapted from SFPE guidance.)
Urban region	In accordance with GO 165, area with a population of more than 1,000 persons per square mile, as determined by the U.S. Bureau of the Census. For purposes of the WMP, "area" must be defined as a census tract.
Utility-related ignition	An event that meets the criteria for a reportable event subject to fire-related reporting requirements.[23]
Validation	Process of determining the degree to which a calculation method accurately represents the real world from the perspective of the intended uses of the calculation method without modifying input parameters based on observations in a specific scenario. (Adapted from ASTM E 1355.)
Vegetation management (VM)	The assessment, intervention, and management of vegetation, including pruning and removal of trees and other vegetation around electrical infrastructure for safety, reliability, and risk reduction.
Verification	Process to ensure that a model is working as designed, that is, that the equations are being properly solved. Verification is essentially a check of the mathematics. (SFPE guidance.)
Vulnerability	The propensity or predisposition of a community to be adversely affected by a hazard, including the characteristics of a person, group, or service and their situation that influences their capacity to anticipate, cope with, resist, and recover from the adverse effects of a hazard.
Wildfire consequence	The total anticipated adverse effects from a wildfire on a community that is reached. This considers the wildfire hazard intensity, the wildfire exposure potential, and the inherent wildfire vulnerabilities of communities at risk.

[23] D.14-02-015, page C-3.

Term	Definition
Wildfire exposure potential	The potential physical, social, or economic impact of wildfire on people, property, critical infrastructure, livelihoods, health, environmental services, local economies, cultural/historical resources, and other high-value assets. This may include direct or indirect impacts, as well as short- and long-term impacts.
Wildfire hazard intensity	The potential intensity of a wildfire at a specific location within the service territory given a probabilistic set of weather profiles, vegetation, and topography.
Wildfire likelihood	The total anticipated annualized number of fires reaching each spatial location resulting from utility-related ignitions at each location in the electrical corporation service territory. This considers the ignition likelihood and the likelihood that an ignition will transition into a wildfire based on the probabilistic weather conditions in the area.
Wildfire mitigation strategy	Overview of the key mitigation initiatives at enterprise level and component level across the electrical corporation's service territory, including interim strategies where long-term mitigation initiatives have long implementation timelines. This includes a description of the enterprise-level monitoring and evaluation strategy for assessing overall effectiveness of the WMP.
Wildfire risk	The total expected annualized impacts from ignitions at a specific location. This considers the likelihood that an ignition will occur, the likelihood the ignition will transition into a wildfire, and the potential consequences—considering hazard intensity, exposure potential, and vulnerability—the wildfire will have for each community it reaches.
Wildfire spread likelihood	The likelihood that a fire with a nearby but unknown ignition point will transition into a wildfire and will spread to a location in the service territory based on a probabilistic set of weather profiles, vegetation, and topography.
Wildfire vulnerability	The susceptibility of people or a community to adverse effects of a wildfire, including all characteristics that influence their capacity to anticipate, cope with, resist, and recover from the

Term	Definition
	adverse effects of a wildfire (e.g., AFN customers, Social Vulnerability Index, age of structures, firefighting capacities).
Wildland-urban interface (WUI)	The line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels (National Wildfire Coordinating Group).
Wire down	Instance where an electric transmission or distribution conductor is broken and falls from its intended position to rest on the ground or a foreign object.
Work order	A prescription for asset or vegetation management activities resulting from asset or vegetation management inspection findings.
Workshop	Discussion that resembles a seminar but is employed to build specific products, such as a draft plan or policy (e.g., a multi-year training and exercise plan).