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Tony Marino, Acting Director  
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Docket #2025 EC AIR

**RE:** LS Power Grid California (LSPGC), 2025 Electrical Corporation Annual Implementation Report Pursuant to Public Utilities Code Section 8386.3(b)(1).

Dear Acting Director Marino,

This report serves as LS Power Grid California's ("LSPGC's") response to Public Utilities Code ("PUC") §8386.3(b)(1), where an electrical corporation ("EC") must file with the Office of Energy Infrastructure Safety ("Energy Safety") a self-evaluation report addressing the electrical corporation's implementation of its approved Wildfire Mitigation Plan (WMP) during an implementation period. LSPGC submits this annual report addressing its compliance with its WMP during the 2025 calendar year.

If you have any questions or requests for additional information, please contact me at [ryadav@lspower.com](mailto:ryadav@lspower.com)

Sincerely,  
Rituraj Yadav  
Associate Manager, Wildfire Mitigation  
LS Power Grid California

## 1. Introduction

This report is developed and submitted in accordance with the Office of Energy Infrastructure Safety (Energy Safety) Performance Guidelines issued in December 2025, which, among other items, directs the development of an Electrical Corporation Annual Implementation Report (EC AIR).

LSPGC submitted its 2023–2025 Base Wildfire Mitigation Plan (WMP) in October 2023, and on January 30, 2024, Energy Safety approved LSPGC's 2023–2025 Base WMP. LSPGC submitted its 2025 WMP Update on July 8, 2024, and on February 18, 2025, Energy Safety approved LSPGC's 2025 WMP Update. This approved 2025 WMP Update is the current version of LSPGC's WMP.

LSPGC's EC AIR report serves to comply with PUC §8386.3(b)(1) addressing annual compliance with its WMP during the 2025 calendar year.

LSPGC is a wholly owned subsidiary of LS Power and a California Electrical Corporation classified as an Independent Transmission Operator (ITO) by Energy Safety. LSPGC does not serve wholesale, distribution, or retail customers and does not have any residential, commercial, or industrial interconnections. Its facilities are placed under the operational control of the California Independent System Operator (CAISO).

During the 2025 implementation period, LSPGC's Orchard Static Synchronous Compensator (STATCOM) Substation (Orchard Substation), located near Huron in Fresno County, was energized in March 2025. Orchard is not located in the High Fire Threat District (HFTD). The Fern Road Static Synchronous Compensator (STATCOM) Substation (Fern Road Substation), located in Shasta County within HFTD Tier 2, remained under construction throughout the 2025 implementation period and is now expected to be energized in 2026.

## 2. Written Narrative

### 2.1. Progress Description Summary

The following subsections describe LSPGC's progress toward achieving its summarized three-year (2023–2025) and ten-year (2026–2032) WMP objectives as identified in Section 4.2 of the 2023–2025 WMP.

### 2.1.1. Grid Design, Operations, and Maintenance

**Three-Year Objective (2023–2025):** Enhance work procedures in HFTD areas and safely transition from construction to operating utility.

**Progress:** LSPGC made substantial progress toward this objective during the 2025 implementation period. LSPGC energized Orchard Substation during March 2025, marking LSPGC's first operational facility in California. LSPGC maintained its Hot Work Program (LSP-01) with Construction Fire Prevention Plans (CFPPs) and Worker Environmental Awareness Program (WEAP) training in effect at both the Orchard and Fern Road Substation construction sites. The TTR Hot Work Policy is in effect at the Fern Road Substation construction site and was previously in effect at the Orchard Substation during its construction phase. Monthly substation inspections (LSP-02) commenced at Orchard Substation in March 2025, with ten (10) inspections completed through December 2025 covering 210 assets. One (1) Level 3 finding was identified and categorized as Priority P3 per the LSPGC Priority Scale Classification. LSPGC integrated the Orchard Substation into its IBM Maximo Computer Maintenance Management System (CMMS) platform (LSP-03), with Fern Road Substation integration activities underway. Fern Road Substation remained under construction and is now expected to be energized in 2026, representing a schedule change from the original WMP projection of late 2025.

**Ten-Year Objective (2026–2032):** Incorporate enterprise asset management system into maintenance program to ensure system reliability and public safety.

**Progress:** LSPGC made early progress on this objective ahead of the ten year timeline. In 2025, LSPGC deployed IBM Maximo as its

CMMS platform and integrated the Orchard Substation into the system, achieving 100% integration of operational assets by Q2 2025. Integration activities for the Fern Road Substation are underway and will be completed upon that asset's energization. This initiative has a WMP completion date of 2026 and remains on track.

### 2.1.2. Vegetation Management and Inspections

**Three-Year Objective (2023–2025):** Establish and maintain a substation vegetation management program to reduce the risk of vegetation contact and potential wildfire spread.

**Progress:** LSPGC established and implemented its vegetation management program at the Orchard Substation upon energization in March 2025. Vegetation conditions around the substation were documented during monthly substation inspections beginning in March 2025. LSPGC further developed and implemented a Substation Defensible Space Inspection program beginning in July 2025, with six (6) dedicated defensible space inspections completed through December 2025 (LSP-04). No vegetation-related issues requiring corrective action were identified during the defensible space inspections. LSPGC maintained one (1) standing work order with a contracted vegetation management company to address weeds around the substation; the work was completed, and the work order was closed prior to year-end. A site visit was conducted on December 17, 2025, to confirm vegetation control effectiveness. LSPGC recorded zero vegetation-caused ignitions, zero vegetation-caused outages, one (1) vegetation management work order opened and closed during the period, and zero open vegetation management work orders at year-end during the 2025 implementation period.

**Ten-Year Objective (2026–2032):** Same as three-year plan – ongoing maintenance through 2032.

**Progress:** This objective continues the three-year plan. LSPGC's vegetation management program is established at Orchard Substation and will be extended to the Fern Road Substation upon energization.

### 2.1.3. Situational Awareness and Forecasting

**Three-Year Objective (2023–2025):** Establish and maintain an environmental monitoring and weather forecasting program that informs measures to reduce the risk of wildfires from environmental or weather-related conditions.

**Progress:** LSPGC achieved this objective. The StormGeo weather forecasting support tool (LSP-05) was fully integrated in 2024, ahead of the Q1 2025 WMP target, and has been used in daily operations throughout 2025. Twenty-nine (29) surveillance cameras were installed at the Orchard Substation by Q1 2025 (LSP-06), providing Transmission System Operators (TSOs) with 24/7 remote viewing capability of indoor and outdoor substation areas. LSPGC recorded zero utility-related ignitions during the 2025 implementation period.

**Ten-Year Objective (2026–2032):** Evaluate and enhance TSOs' use of live video.

**Progress:** LSPGC began advancing this objective in 2025 (LSP-07). An internal meeting was held with System Operations team members to review camera usage and operational needs, resulting in one (1) camera live feed analysis. System Operations used the camera system to support ongoing situational awareness and physical security monitoring at the Orchard Substation. There were no wildfire events near the substation that required incident-specific live video analysis. As LSPGC matures operationally, formal analysis practices and reporting for live video usage are expected to expand. This initiative is on track to hit the target WMP completion date of December 2028.

#### 2.1.4. Emergency Preparedness

**Three-Year Objectives (2023–2025):** (1) Establish and implement fire-safe construction practices to reduce the risk of ignition; (2) ensure site locations and access information are integrated into relevant dispatch systems; and (3) establish contact with local public safety and fire agencies.

**Progress:** LSPGC completed all three-year emergency preparedness objectives during the 2023–2025 WMP cycle. Fire-safe construction practices were established through the TTR Hot Work Program and CFPPs at both substation sites (LSP-01). Site locations and access information were integrated into relevant dispatch systems in 2024 (LSP-08). Emergency Operations Plan EOP 011 was drafted in 2024 and put into effect in 2025. LSPGC established and maintained contact with local fire agencies (LSP-09), including hosting Director Caroline Thomas Jacobs from OEIS and Deputy Fire Chief Don Watt from CAL FIRE Shasta County at the Fern Road Substation construction site (documented in September 2025 WEAP logs). Additionally, Heath Holt, Senior Manager, HSE, conducted informal visits to CAL FIRE Station 35 in Whitmore on March 18, 2025, and May 21, 2025. LSPGC recorded zero utility-related ignitions during the 2025 implementation period.

**Ten-Year Objective (2026–2032):** Establish more formalized review of emergency preparedness procedures with benchmarking systems.

**Progress:** LSPGC began advancing this objective in 2025 (LSP-10). Emergency Operations Plan EOP 011 was put into effect, and an internal meeting was held to review and update EOP 011, including benchmarking elements. LSPGC also participated in the CEATI Wildfire Mitigation and Resiliency Working Group, which includes benchmarking discussions on wildfire mitigation program practices across utilities. The Q4 Quarterly Data Report (QDR) reports two (2)

emergency preparedness review activities completed in 2025. This initiative has a WMP completion date of December 2027.

### 2.1.5. Community Outreach and Engagement

**Three-Year Objective (2023–2025):** Establish and maintain relationships with local agencies and officials.

**Progress:** LSPGC established and maintained relationships with local agencies and the interconnecting utility throughout the 2023–2025 WMP cycle. In 2025, LSPGC conducted two (2) meetings with local fire agencies (LSP-09), meeting the WMP annual target.

**Ten-Year Objective (2026–2032):** Formalize a mechanism to share lessons learned among ITO peers.

**Progress:** LSPGC advanced this objective in 2025 (LSP-11) with eight (8) documented instances of collaboration. LSPGC representatives participated in the Red Sky Summit (San Francisco), AI and the Grid Conference, Grid FWD Wildfire Symposium, OEIS Wildfire Symposium, WEI WMP Workshop, and EUCI Wildfire Mitigation for Utilities Conference. LSPGC representative presented at the EUCI Disaster Preparedness Utilities Conference. These activities supported relationship building and best practice exchange, including participation in the Joint IOU WMP Group in California alongside other utilities. This initiative has a WMP completion date of December 2029.

## 2.2. Progress Description Detail

The following subsections describe LSPGC's progress towards achieving the three-year and ten-year detailed objectives listed in the tables in Section 8 of its WMP, including all subsections, with completion dates within the 2025 implementation period.

### 2.2.1. Grid Design, Operations, and Maintenance (Section 8.1)

**Objective (3-Year, Table 8-1): Enhance work procedures in HFTD areas.**

- **Initiative(s):** Implement Hot Work Programs during construction and maintenance activities, LSP-01
- **WMP Reference:** Section 8.1.1.2, Page 99
- **WMP Completion Date:** April 2023
- **2025 Progress:** This objective was completed in 2023 and continued to be maintained through 2025. WEAP Training Materials remained in effect at the Orchard Substation (effective 9/13/2022) and the Fern Road Substation (effective 1/12/2024). Construction Fire Prevention Plan is active at Fern Road substation and was previously active at the Orchard Substation. The TTR Welding, Cutting, and Hot Work Policy is in effect at the Fern Road Substation construction site and was previously in effect at Orchard Substation during construction. WEAP training was documented through the Fern Road Substation WEAP logs 2025. The Q4 QDR reports LSP-01 as "Completed" with two (2) active hot work programs (one per site).

**Objective (3-Year, Table 8-1): Safely transition from construction to operating utility.**

- **Initiative(s):** Implement Substation Inspection Program, LSP-02
- **WMP Reference:** Section 8.2, Page 117
- **WMP Completion Date:** Q1 2025
- **2025 Progress:** Substation inspections commenced at Orchard Substation in March 2025, with the substation's energization. Ten (10) monthly inspections were completed from March 2025 through December 2025, covering 210 assets. One (1) Level 3 finding was identified, categorized as Priority P3. LSPGC successfully transitioned Orchard Substation from construction to operational status. The Fern Road Substation remained under construction.

**Objective (10-Year, Table 8-2): Incorporate enterprise assets management system into maintenance program to ensure system reliability and public safety.**

- **Initiative(s):** Enhance use of CMMS/automation into LSPGC maintenance work orders, LSP-O3
- **WMP Reference:** Section 8.1.7, Page 108
- **WMP Completion Date:** 2026
- **2025 Progress:** IBM Maximo was deployed as LSPGC's CMMS platform, achieving 100% integration of operational assets by Q2 2025. Total 2025 Maximo expenditure was \$52.252K, comprising affiliate labor (\$47,791.81), sales and use tax (\$83.46), software (\$3,023.11), and travel and expenses (\$1,353.85).

### 2.2.2. Vegetation Management and Inspections (Section 8.2)

**Objective (3-Year, Table 8-12): Establish and maintain a vegetation management program to reduce the risk of vegetation contact and potential wildfire spread.**

- **Initiative(s):** Establish risk-based buffer zones and implement monthly substation inspection program once operational, LSP-O4
- **WMP Reference:** Section 7.2.1, Page 93
- **WMP Completion Date:** Established once operational; ongoing maintenance through 2025
- **2025 Progress:** LSPGC established its vegetation management program at the Orchard Substation upon energization in March 2025. Vegetation conditions were documented during monthly substation inspections. LSPGC developed a dedicated Substation Defensible Inspection program and implemented it beginning July 2025, with six (6) inspections completed through December 2025. No issues were identified during the defensible inspections. LSPGC maintained a standing work order with a contracted vegetation

management company to address weeds; the work was completed, and the work order was closed. A site visit was conducted on December 17, 2025, to confirm vegetation control effectiveness. LSPGC had one (1) vegetation management work order opened and closed during the period, and zero open vegetation management work orders at year-end during the 2025 implementation period.

**Objective (10-Year, Table 8-13): Same as three-year plan; ongoing maintenance through 2032.**

- **2025 Progress:** Same as above. The program is established and operational at Orchard Substation and will extend to the Fern Road Substation upon energization.

### 2.2.3. Situational Awareness and Forecasting (Section 8.3)

**Objective (3-Year, Table 8-21): Establish and maintain an environmental monitoring and weather forecasting program to reduce the risk of wildfires from environmental or weather-related conditions.**

- **Initiative(s):** Integrate StormGeo, a weather forecasting support tool, LSP-05
- **WMP Reference:** Section 7.2.1, Page 94
- **WMP Completion Date:** Q1 2025
- **2025 Progress:** StormGeo was fully integrated in 2024, ahead of the Q1 2025 WMP completion date. Per the Q4 2025 QDR, integration was completed in 2024 and has since been used in daily operations throughout 2025. StormGeo was used to provide weekly wildfire weather forecasts in the weekly operations call.

**Objective (3-Year, Table 8-21): Establish and maintain an environmental monitoring and weather forecasting program to reduce the risk of wildfires from environmental or weather-related conditions.**

- **Initiative(s):** Install substation cameras, LSP-06
- **WMP Reference:** Section 8.3.2, Page 130
- **WMP Completion Date:** Q4 2025
- **2025 Progress:** Twenty-nine (29) cameras were installed at the Orchard Substation by Q1 2025, ahead of the Q4 2025 WMP target. Installation is documented through purchase order LSP10116 (cameras) and purchase order LSP10121 (commissioning of cameras). The Fern Road Substation remained under construction, and camera installation at Fern Road Substation will occur in conjunction with that facility's commissioning.

**Objective (10-Year, Table 8-22): Evaluate operational maturity related to use of live video.**

- **Initiative(s):** Evaluate and enhance use of live video, LSP-07
- **WMP Reference:** Section 8.3.2, Page 132
- **WMP Completion Date:** December 2028
- **2025 Progress:** In 2025, LSPGC held an internal meeting to review camera usage and operational needs, resulting in one (1) camera live feed analysis. System Operations used the camera system to support ongoing situational awareness and physical security monitoring. There were no wildfire events near the substation that required incident-specific live video analysis. The Q4 QDR reports status as "In Progress," consistent with the ten-year timeline.

#### **2.2.4. Emergency Preparedness (Section 8.4)**

**Objective (3-Year, Table 8-33): Establish and implement fire-safe construction practices to reduce the risk of ignition.**

- **Initiative(s):** Implement Hot Work Programs during construction and maintenance activities, LSP-01
- **WMP Reference:** Section 8.3.4, Page 134
- **WMP Completion Date:** October 2023

- **2025 Progress:** Completed in 2023 and maintained through 2025. Construction Fire Prevention Plans (CFPPs), WEAP training, and TTR Hot Work Policies remained active at both substation sites throughout the implementation period.

**Objective (3-Year, Table 8-33): Ensure site locations and access information are integrated into relevant dispatch systems.**

- **Initiative(s):** Integrate into local dispatch systems, LSP-08
- **WMP Reference:** Section 8.4.3, Page 155
- **WMP Completion Date:** June 2024
- **2025 Progress:** Completed in 2024. Local public safety officials at both substation areas were contacted and site-specific information was provided to CalFire. Efforts were made to verify that the substation site locations are accurately captured in the local dispatch systems and the initiative is completed.

**Objective (3-Year, Table 8-33): Establish contact with local public safety and fire agencies.**

- **Initiative(s):** Establish annual contact with local fire agencies, LSP-09
- **WMP Reference:** Section 8.5.4, Page 177
- **WMP Completion Date:** Ongoing
- **2025 Progress:** LSPGC met the target of two (2) meetings in 2025 (per Q4 QDR: Q1=0, Q1-2=1, Q1-3=2, Q1-4=2). Activities included hosting OEIS Director Caroline Thomas Jacobs and CAL FIRE Shasta County Deputy Fire Chief Don Watt at the Fern Road Substation site (documented in September WEAP Logs), and informal visits by Heath Holt, Senior Manager, HSE, to CAL FIRE Station 35 on March 18, 2025, and May 21, 2025.

**Objective (10-Year, Table 8-34): Establish continuous improvement of emergency plan and procedures.**

- **Initiative(s):** Formalized review with benchmarking, LSP-10

- **WMP Reference:** Section 8.4.2, Page 143
- **WMP Completion Date:** December 2027
- **2025 Progress:** Emergency Operations Plan EOP 011 was put into effect in 2025. An internal meeting was held to review and update EOP 011, including benchmarking elements based on PG&E initiatives. LSPGC also participated in the CEATI Wildfire Mitigation and Resiliency Working Group. The Q4 QDR reports two (2) emergency preparedness review activities completed with status "Completed" for the 2025 period.

**2.2.5. Community Outreach and Engagement (Section 8.5)  
Objective (3-Year, Table 8-53): Establish and maintain relationships with local agencies and officials.**

- **Initiative(s):** Establish annual contact with local fire agencies, LSP-09
- **WMP Reference:** Section 8.5.4, Page 176
- **WMP Completion Date:** Ongoing
- **2025 Progress:** LSPGC met the target of two (2) meetings in 2025 (per Q4 QDR: Q1=0, Q1-2=1, Q1-3=2, Q1-4=2). Activities included hosting OEIS Director Caroline Thomas Jacobs and CAL FIRE Shasta County Deputy Fire Chief Don Watt at the Fern Road Substation site (documented in September WEAP Logs), and informal visits by Heath Holt, Senior Manager, HSE, to CAL FIRE Station 35 on March 18, 2025, and May 21, 2025.

**Objective (10-Year, Table 8-54): Formalize mechanisms to share lessons learned among ITO peers.**

- **Initiative(s):** Best practice sharing, LSP-11
- **WMP Reference:** Section 8.5.5, Page 178
- **WMP Completion Date:** December 2029
- **2025 Progress:** Eight (8) instances of collaboration documented (per Q4 QDR: Q1=3, Q1-2=4, Q1-3=5, Q1-4=8). Rituraj Yadav, Associate Manager, Wildfire Mitigation, participated in the Red Sky Summit (San Francisco), AI and

the Grid Conference, Grid FWD Wildfire Symposium, OEIS Wildfire Symposium, WEI WMP Workshop, and EUCI Wildfire Mitigation for Utilities Conference. He presented at the EUCI Disaster Preparedness Utilities Conference. LSPGC has started participating in the Joint IOU WMP Group in California alongside other utilities starting 2026.

### 2.3. Completion Assessment

The following subsections provide LSPGC's assessment of completion for objectives with completion dates within the 2025 implementation period, as required by the Performance Guidelines Section 6.0(1)(c).

#### 2.3.1. Enhance Work Procedures in HFTD Areas

- **WMP Completion Date:** April 2023
- **Actual Completion Date:** April 2023
- **Method of Verification:** Updated WEAP training program
- **Assessment:** Completed on schedule. LSPGC implemented its Hot Work Program at both the Orchard and Fern Road construction sites. WEAP Training Materials were established at the Orchard Substation (effective 9/13/2022) and the Fern Road Substation (effective 1/12/2024). Construction Fire Prevention Plan is active at Fern Road substation and was previously active at the Orchard Substation. The TTR Welding, Cutting, and Hot Work Policy was in effect at the Fern Road construction site and was previously in effect at Orchard during its construction phase. The program was maintained through the full 2023–2025 WMP cycle. The Q4 QDR reports two (2) active hot work programs (one per site) with status "Completed." Zero utility-related ignitions were recorded across the entire 2023–2025 implementation period. Evidence relied upon includes WEAP Training Materials, CFPPs, TTR Hot Work Policy, and Fern Road Sub WEAP logs 2025.

#### 2.3.2. Safely Transition from Construction to Operating Utility (LSP-02)

- **WMP Completion Date:** Q1 2025

- **Actual Completion Date:** March 2025
- **Method of Verification:** Monthly inspection reports
- **Assessment:** Completed. The Orchard Substation was energized in March 2025, and LSPGC commenced monthly substation inspections in the same month. Ten (10) inspections were completed from March 2025 through December 2025, covering 210 assets per the Q4 QDR. One (1) Level 3 finding was identified across inspections, categorized as Priority P3 per the LSPGC Priority Scale Classification; no corrective work order was required. Evidence relied upon includes monthly substation inspection reports dated 03/27/2025 through 12/15/2025 and the Q4 2025 QDR. The Fern Road Substation remained under construction throughout 2025 and is expected to be energized in 2026.

### 2.3.3. Establish and Maintain Vegetation Management Program (LSP-04)

- **WMP Completion Date:** Established once operational; ongoing maintenance through 2025
- **Actual Completion Date:** Established March 2025 (commensurate with Orchard Substation energization)
- **Method of Verification:** WMP Implementation; Inspection Report
- **Assessment:** Completed. Vegetation management activities were integrated into monthly substation inspections at Orchard Substation from March 2025. LSPGC developed and implemented a dedicated Substation Defensible Space Inspection program beginning July 2025. Six (6) dedicated defensible space inspections were completed through December 2025 with no issues identified. LSPGC maintained one (1) standing work order with a contracted vegetation management company to address weeds; the work was completed, and the work order was closed prior to year-end. Confirmation site visits were conducted on December 12, 2025, and December 17, 2025. The Q4 QDR reports one (1) vegetation management work order opened and closed

during the period and zero (0) open vegetation management work orders at year-end. Zero vegetation-caused ignitions and zero vegetation-caused outages were recorded during the 2025 implementation period.

#### 2.3.4. Integrate StormGeo Weather Forecasting Support Tool (LSP-05)

- **WMP Completion Date:** Q1 2025
- **Actual Completion Date:** Q4 2024 (completed ahead of the WMP target)
- **Method of Verification:** Updated work procedures and site commissioning documentation
- **Assessment:** Completed ahead of schedule. Per the Q4 2025 QDR, StormGeo integration was completed in 2024 and has since been used in daily operations throughout 2025. The system provides System Operations and field personnel with relevant weather notifications to inform operational decisions, including Red Flag Warnings and extreme weather events. In addition, Rituraj Yadav, Associate Manager – Wildfire Mitigation provides weekly wildfire weather updates in the weekly operations call using StormGeo.

#### 2.3.5. Install Substation Cameras (LSP-06)

- **WMP Completion Date:** Q4 2025
- **Actual Completion Date:** Q1 2025
- **Method of Verification:** Updated work procedures and site commissioning documentation
- **Assessment:** Completed. Twenty-nine (29) cameras were installed at the Orchard Substation in 2024 and were commissioned as a direct feed into the System Operations command center concurrent with the site's energization in early 2025. Evidence relied upon includes purchase order LSP10116 (cameras) and purchase order LSP10121 (commissioning). The Fern Road Substation remained under construction; camera installation at Fern Road Substation will occur in conjunction with that facility's commissioning.

### 2.3.6. Ensure Integration into Local Dispatch Systems (LSP-08)

- **WMP Completion Date:** June 2024
- **Actual Completion Date:** June 2024
- **Method of Verification:** Emergency Plan
- **Completed on schedule.** Completed on schedule. LSPGC ensured site locations and access information were integrated into relevant local public safety dispatch systems in 2024. Emergency Operations Plan EOP 011 was subsequently put into effect in 2025, further formalizing emergency response protocols. The Q4 QDR confirms status as "Completed" with the note "Completed in 2024." No incremental activities or expenditures were required in 2025. Local public safety officials at both substation areas were contacted and site-specific information was provided to CalFire in 2024. Efforts were made to verify that the substation site locations are accurately captured in the local dispatch systems. Evidence relied upon includes Emergency Operations Plan EOP 011 and email exchanges.

### 2.3.7. Establish Annual Contact with Local Fire Agencies (LSP-09)

- **WMP Completion Date:** Ongoing (annual target of 2 meetings per year throughout 2023–2025)
- **Actual Completion Date:** Target met each year; 2025 target met by Q3 2025
- **Method of Verification:** Meeting minutes/records
- **Assessment: Completed.** LSPGC met the annual target of two (2) meetings with local fire agencies in 2025 (per Q4 QDR: Q1=0, Q1-2=1, Q1-3=2, Q1-4=2). Activities in 2025 included hosting OEIS Director Caroline Thomas Jacobs and CAL FIRE Shasta County Deputy Fire Chief Don Watt at the Fern Road construction site (documented in September 2025 WEAP Logs), and informal visits by Heath Holt, Senior Manager, HSE, to CAL FIRE Station 35 in Whitmore on March 18, 2025, and May 21, 2025. The Q4 QDR reports status as "Completed." Actual 2025 expenditure: \$3.239K (OPEX). Evidence relied upon includes September 2025 WEAP Logs, and meeting records to schedule the site visit.

### 2.3.8. Quality of Implementation Assessment

- **Substation Inspections (LSP-02):** Per WMP Table 8-7, substation inspections in HFTD areas have a yearly target pass rate of 100% for 2023–2025. The Orchard Substation is not located in an HFTD area. Per the WMP, non-HFTD assets require a field audit at least once during each three-year WMP cycle. On October 22, 2025, Patrick Marnell, Field Operations Supervisor, completed the Annual Facility Inspection Checklist at the Orchard Substation. The Annual Facility Inspection covered substation asset conditions including transformers (OD-TR-J1, OD-TR-J2, OD-TR-J3), SSVTs (SSVT-A1, SSVT-A2), security, and response equipment. All ten (10) monthly substation inspections completed at Orchard during 2025 were performed by experienced and trained personnel, with results documented and submitted to LSPGC management. Per the Q4 QDR, 210 assets were inspected with one (1) Level 3 finding identified. The QA/QC field audit requirement for substation inspections at non-HFTD assets within the 2023–2025 WMP cycle has been satisfied.
- **Vegetation Management (LSP-04):** Per WMP Table 8-18, vegetation management buffer audits in HFTD areas have a yearly target pass rate of 95%. The Orchard Substation is not located in an HFTD area; therefore, a field audit is required at least once during the three-year WMP cycle for non-HFTD assets. On October 22, 2025, Patrick Marnell, Field Operations Supervisor, completed a QA/QC field review of the most recent Defensible Space Inspection at the Orchard Substation (conducted on October 20, 2025, by Tanner Sisneros, Substation Operator). Per the Substation Defensible Space Procedure, Section 5.0 Quality Assurance, the field review was performed by a supervisor who was not the person responsible for performing the inspection. No discrepancies were identified between the inspection report and field conditions observed. The QA/QC field audit

requirement for non-HFTD assets within the 2023–2025 WMP cycle has been satisfied.

## 2.4. Target Assessment

The following subsections provide LSPGC's assessment of completion for all targets with target completion dates within the 2025 implementation period, as required by the Performance Guidelines Section 6.0(1)(d).

### 2.4.1. LSP-01 — Implement Hot Work Programs

- **Target:** Implementation of hot work program (2 programs — one per site)
- **Actual:** 2 programs maintained (per Q4 QDR: Q1=2, Q1-2=2, Q1-3=2, Q1-4=2)
- **WMP Completion Date:** April 2023 (maintained ongoing through 2025)
- **Actual Completion Date:** April 2023
- **Method of Verification (per WMP):** Updated WEAP training program
- **Assessment:** Completed in 2023 and maintained through 2025. The TTR Hot Work Policy is in effect at the Fern Road Substation construction site and was previously in effect at Orchard Substation during its construction phase. WEAP training continued at both sites. The Q4 QDR reports status as "Completed."
- **Evidence:** WEAP Training Materials (Orchard Substation effective 9/13/2022; Fern Road Substation effective 1/12/2024); Orchard CFPP (09/09/2022) & Fern Road CFPP (06/2023); TTR Welding, Cutting, and Hot Work Policy; Fern Road Substation WEAP logs 2025; Q4 2025 QDR.

### 2.4.2. LSP-02 — Implement Inspection Program

- **Target (End of Q2 2025):** 6 inspections
- **Actual (End of Q2 2025):** 4 inspections (per Q4 QDR cumulative Q1-2)
- **Target (End of Q3 2025):** 9 inspections

- **Actual (End of Q3 2025):** 7 inspections (per Q4 QDR cumulative Q1-3)
- **Target (Year-End 2025):** 15 inspections
- **Actual (Year-End 2025):** 10 inspections (per Q4 QDR cumulative Q1-4)
- **Target Completion Date:** 2025
- **Actual Completion Date:** Inspections commenced March 2025 (upon energization)
- **Method of Verification (per WMP):** Inspection Reports (Section 7.2.2)
- **Assessment:** LSPGC completed ten (10) substation inspections at the Orchard Substation from March through December 2025, covering 210 assets with one (1) Level 3 finding (P3 priority). The WMP target of fifteen (15) inspections was based on the assumption that both substations would be operational for the full calendar year. Because the Orchard Substation was energized in March 2025, monthly inspections commenced in March rather than January, and the Fern Road Substation remained under construction. LSPGC maintained a consistent monthly inspection cadence from the first month of operation and completed inspections for every month the substation was operational. The Q4 QDR reports status as "Completed." Actual 2025 expenditure: \$14.400K (OPEX).
- **Evidence:** Monthly substation inspection reports dated 03/27/2025 through 12/15/2025; Q4 2025 QDR; EOY data submission.
- **Corrective Action:** LSPGC will continue monthly inspections at Orchard Substation in 2026 and will commence inspections at Fern Road Substation upon its energization. LSPGC anticipates meeting or exceeding the annual inspection target when both substations are operational for a full calendar year.

#### 2.4.3. LSP-03 – Enhance Use of CMMS/Automation

- **Target (Year-End 2025):** 100% of major assets residing in CMMS database

- **Actual:** 100% integration achieved (per Q4 QDR: Q1=0%, Q1-2=100%, Q1-3=100%, Q1-4=100%)
- **Target Completion Date:** 2025
- **Actual Completion Date:** Orchard Substation integration completed 2025; Fern Road Substation pending energization
- **Method of Verification (per WMP):** CMMS database export (Section 7.2.2)
- **Assessment:** Completed. The Orchard Substation, LSPGC's only energized and operational facility, was fully integrated into IBM Maximo by Q2 2025. The Fern Road Substation remained under construction; Maximo integration activities are underway and will be completed upon energization. The Q4 QDR reports status as "Completed." Actual 2025 expenditure: \$52.252K (OPEX, Territory).
- **Evidence:** 2025 Maximo cost summary; Q4 2025 QDR; EOY data submission.

#### 2.4.4. LSP-04 – Vegetation Inspection

- **Target (End of Q2 2025):** 6 inspections
- **Target (End of Q3 2025):** 9 inspections
- **Target (Year-End 2025):** 15 inspections, monthly and ahead of extreme weather events, removal of all vegetation greater than 3" in buffer zone, ensuring no vegetation/substation contact
- **Actual:** 10 vegetation inspections cumulative through Q4 (per Q4 QDR: Q1=1, Q1-2=4, Q1-3=7, Q1-4=10). Six (6) dedicated Substation Defensible Inspections from July through December 2025. One (1) vegetation management work order opened, work completed, and work order closed. Zero open vegetation management work orders at year-end. Zero vegetation-caused ignitions. Zero vegetation-caused outages.
- **Target Completion Date:** 2025
- **Actual Completion Date:** Established March 2025; ongoing
- **Method of Verification (per WMP):** Quarterly and annual data report (Section 7.2.2)

- **Assessment:** Similar to LSP-02, the annual target of fifteen (15) inspections was based on a full calendar year of operations at both substations. Orchard Substation was energized in March 2025, and vegetation management activities commenced immediately. LSPGC documented vegetation conditions during all ten (10) monthly substation inspections and conducted six (6) dedicated defensible inspections beginning July 2025. Vegetation extending into the buffer zone was managed through a contracted vegetation management company; work was completed and the work order was closed. No vegetation/substation contact was observed. The Q4 QDR reports status as "Completed." Actual 2025 expenditure: \$39.300K (OPEX).
- **Evidence:** Monthly substation inspection reports (Section 3 – Yard and Substation Defensible Space Section); Q4 2025 QDR (Table 2: 0 open vegetation management work orders); EOY data submission.

#### 2.4.5. LSP-05 – Integrate StormGeo

- **Target (Year-End 2025):** 100% Integration
- **Actual:** 100% integration achieved (completed in 2024; in active daily use throughout 2025)
- **Target Completion Date:** 2025
- **Actual Completion Date:** Q4 2024 (ahead of schedule)
- **Method of Verification (per WMP):** QDR
- **Assessment:** Completed ahead of schedule. Per the Q4 2025 QDR, StormGeo integration was completed in 2024 and has since been used in daily operations. The QDR reports 0% incremental integration in 2025 because full integration was already achieved in the prior year. The Q4 QDR reports status as "Completed."
- **Evidence:** Purchase Order LSP3546; LSPGC EOP-011; Q4 2025 QDR (status: Completed; comment: "Integration was completed in 2024 and since has been used in daily operations"); EOY data submission.

#### 2.4.6. LSP-06 — Install Cameras at Orchard Substation/Fern Road Substation

- **Target (2025):** 0 additional cameras (per Table 8-23; 29 cameras were designated for 2024 installation)
- **Actual:** 29 cameras installed at Orchard Substation in 2024
- **Target Completion Date:** Q4 2025 (per Table 8-21 objective)
- **Actual Completion Date:** Q1 2025 (with asset energization)
- **Method of Verification (per WMP):** QDR
- **Assessment:** The 29 cameras were installed at Orchard Substation concurrent with the facility's commissioning in Q1 2025, achieving the objective ahead of the Q4 2025 deadline. The Q4 QDR reports status as "Completed."
- **Evidence:** Purchase order LSP10116 (camera units); Purchase order LSP10121 (camera commissioning).

#### 2.4.7. LSP-07 — Evaluate and Enhance Use of Live Video

- **Target:** Camera live feed analysis (ten-year initiative; completion December 2028)
- **WMP Completion Date:** December 2028
- **Actual Completion Date:** Ongoing; on track
- **Method of Verification (per WMP):** Updated work procedures
- **Assessment:** This ten-year initiative is progressing. An internal meeting was held with System Operations to review camera usage and operational needs. One (1) camera live feed analysis was completed in Q4 2025. As the Orchard Substation was only energized in March 2025, LSPGC is building its operational maturity for this initiative. The Q4 QDR reports status as "In Progress," consistent with the December 2028 completion timeline.
- **Evidence:** Live Camera Use Internal Meeting Record; Q4 2025 QDR.

#### 2.4.8. LSP-08 — Integrate into Local Dispatch Systems

- **Target:** Integration into dispatch systems
- **WMP Completion Date:** June 2024
- **Actual Completion Date:** 2024

- **Method of Verification (per WMP):** Emergency Plan
- **Assessment:** Completed in 2024. No incremental activities or expenditures in 2025. The Q4 QDR reports status as "Completed" with the note "Completed in 2024."
- **Evidence:** Emergency Operations Plan EOP 011; Email Exchanges; Q4 2025 QDR.

#### 2.4.9. LSP-09 — Meetings with Local Agencies

- **Target (Year-End 2025):** 2 meetings
- **Actual:** 2 meetings (per Q4 QDR: Q1=0, Q1-2=1, Q1-3=2, Q1-4=2)
- **Target Completion Date:** 2025
- **Actual Completion Date:** Q3 2025
- **Method of Verification (per WMP):** Meeting minutes/records
- **Assessment:** Target met. Two (2) meetings completed by Q3 2025. The Q4 QDR reports status as "Completed." Actual 2025 expenditure: \$3.239K (OPEX).
- **Evidence:** September 2025 WEAP Logs; Meeting records to schedule the site visit.

#### 2.4.10. LSP-10 — Formalized Review with Benchmarking

- **Target:** Drafting of Emergency Preparedness Plan (ten-year initiative; completion December 2027)
- **Actual:** 2 (per Q4 QDR: Q1=1, Q1-2=1, Q1-3=2, Q1-4=2)
- **Target Completion Date:** December 2027
- **Actual Completion Date:** Ongoing; on track
- **Method of Verification (per WMP):** Updates to Emergency Plan
- **Assessment:** Progressing on schedule. EOP 011 was put into effect and reviewed with benchmarking. LSPGC also participated in the CEATI Wildfire Mitigation and Resiliency Working Group. The Q4 QDR reports status as "Completed" for the 2025 period.
- **Evidence:** EOP 011 documentation; CEATI Working Group participation records; Q4 2025 QDR.

#### 2.4.11. LSP- 11 — Best Practice Sharing

- **Target:** Instances of collaboration (ten-year initiative; completion December 2029)
- **Actual:** 8 instances of collaboration (per Q4 QDR: Q1=3, Q1-2=4, Q1-3=5, Q1-4=8)
- **Target Completion Date:** December 2029
- **Actual Completion Date:** Ongoing; on track
- **Method of Verification (per WMP):** Documented instances of collaboration
- **Assessment:** Strong progress. Eight (8) documented instances including conferences, a presentation at the EUCI Disaster Preparedness Utilities Conference, and participation in the Joint IOU WMP Group. The Q4 QDR reports status as "Completed" for the 2025 period. Actual 2025 expenditure: \$19.151K (OPEX).
- **Evidence:** Conference attendance records; EUCI presentation agenda; Q4 2025 QDR; EOY data submission.

## 2.5. Risk Reduction Assessment

Per the Performance Guidelines Section 6.0(1)(c)(ix), the following table presents the expected risk reduction as listed in the WMP and LSPGC's assessment of actual risk reduction achieved for the 2025 implementation period.

As stated in the WMP, LSPGC did not assign quantifiable percentage risk impact values to any initiative for the 2025 implementation period. This is because LSPGC was transitioning from construction to operation during this period and lacked a baseline operational risk profile from which to measure percentage reductions. For assets in an HFTD and HFRA, the WMP identified that the vegetation buffer zone increase from 30 feet to 100 feet represents an approximately 230% increase in the mitigation measure, directly correlated to risk reduction. However, the Orchard Substation is not located in an HFTD, and the Fern Road Substation (located in HFTD Tier 2) was not yet operational in 2025.

**Table 2: Risk Reduction Achieved**

WMP Initiative	WMP Expected Risk Reduction (2025)	Actual Risk Reduction Achieved	Explanation and Actions Taken
LSP-01: Implement Hot Work Programs	0% (not quantified in WMP)	N/A	Maintained at both sites. Zero utility-related ignitions in 2025.
LSP-02: Implement Substation Inspection Program	0% (not quantified in WMP)	N/A	10 inspections completed. 210 assets inspected, 1 Level 3 (P3) finding. Zero ignitions.
LSP-03: Enhance CMMS/Automation	N/A (not quantified in WMP)	N/A	Orchard Substation integrated into IBM Maximo by Q2 2025.
LSP-04: Vegetation Inspection	N/A (not quantified in WMP)	N/A	Program established. Zero vegetation-caused ignitions or outages. Zero open work orders at year-end.
LSP-05: Integrate StormGeo	0% (per WMP Table 8-23)	N/A	Completed in 2024. In active daily operational use throughout 2025.
LSP-06: Install Cameras	0% (per WMP Table 8-23)	N/A	29 cameras installed at Orchard Substation by Q1 2025.
LSP-07: Evaluate Live Video	N/A (ten-year initiative)	N/A	1 camera live feed analysis completed. In Progress per Q4 QDR.

LSP-08: Integrate Dispatch Systems	N/A (completed 2024)	N/A	Completed in 2024. No additional activity in 2025.
LSP-09: Meetings with Local Agencies	0% (not quantified in WMP)	N/A	Target of 2 meetings met.
LSP-10: Formalized Review/Benchmarking	N/A (ten-year initiative)	N/A	EOP 011 reviewed. 2 review activities completed.
LSP-11: Best Practice Sharing	N/A (ten-year initiative)	N/A	8 instances of collaboration documented.

LSPGC recorded zero utility-related ignitions, zero vegetation-caused ignitions, zero vegetation-caused outages, and zero outage events not caused by vegetation during the 2025 implementation period.

### 3. Petition to Amend Filings

LSPGC did not file any petitions to amend its 2023–2025 WMP during the 2023–2025 implementation period. No change orders were requested or approved.

### 4. Initiative Budget and Expenditure Summary

**WMP Planned Budget for 2025:** 250 (thousands USD, per WMP Table 4-1)

**2025 Actual Total Expenditure:** approximately 142.668 K (thousands USD)

The following table presents actual 2025 expenditures by initiative as reported in LSPGC's Annual End of Year data submission. All amounts are in thousands of U.S. dollars. Initiatives without a reported actual value had no direct expenditure in the 2025 implementation period; these are either programmatic in nature (conducted through existing staff activities at no incremental cost), were completed in a prior year, or have completion dates beyond 2025.

Initiative Tracking ID	Initiative Name	WMP Category / EOY Mapping	Expense Type	Actual Expenditure (2025, \$ Thousands)	Compliance Status
LSP-01	Implement Hot Work Programs during construction and maintenance activities	Grid Design, Operations, and Maintenance	OPEX	\$0	Completed April 2023; maintained through 2025 via existing WEAP training and CFPPs.
LSP-02	Implement Substation Inspection Program	Grid Design, Operations, and Maintenance / Asset Inspections	OPEX,	\$14.400	In Compliance
LSP-03	Enhance use of CMMS/Automation into LSPGC Maintenance Work Orders	Enterprise Systems / Enterprise Systems Development	OPEX,	\$52.252	In Compliance
LSP-04	Establish risk-based buffer zones and implement monthly substation inspection program	Vegetation Management and Inspections / Defensible Space	OPEX,	\$39.300	In Compliance
LSP-05	Integrate StormGeo, a weather forecasting support tool	Situational Awareness and Forecasting	OPEX	\$0	Completed in 2024. In active daily operational use

					throughout 2025.
LSP-06	Install substation cameras	Situational Awareness and Forecasting / Grid Monitoring Systems	CAPEX,	\$14.326	In Compliance
LSP-07	Evaluate and enhance use of live video	Situational Awareness and Forecasting	OPEX	\$0	Ten-year initiative (December 2028). 2025 activities conducted through internal meetings.
LSP-08	Integrate into local dispatch systems	Emergency Preparedness	OPEX	\$0	Completed June 2024.
LSP-09	Establish annual contact with local fire agencies	Emergency Preparedness / Public Communication	OPEX, HFTD	\$3.239	In Compliance
LSP-10	Formalized review with benchmarking	Emergency Preparedness	OPEX	\$0	Ten-year initiative (December 2027). 2025 activities conducted through internal staff efforts.
LSP-11	Best practice sharing	Community Outreach /	OPEX, Territory	\$19.151	In Compliance

		Public Communication			
<b>TOTAL</b>				<b>\$142.668</b>	

**Variance Explanation:** The actual total 2025 expenditure of approximately \$142.668K is approximately 43% below the planned budget of \$250K. LSPGC provides the following explanation for this variance:

The WMP planned budget of \$250K for 2025 was established in 2023 when both the Orchard and Fern Road Substations were projected to be energized during 2025, which would have required concurrent operational expenditures at both sites. However, only the Orchard Substation was energized (March 2025), while the Fern Road Substation remained under construction throughout 2025 and is now expected to be energized in 2026. This delayed the onset of several operational expenditures at the Fern Road Substation site, including asset inspections, vegetation management activities, and camera installations. Additionally, certain initiatives (LSP-01, LSP-08, LSP-05) were completed in prior years and required no incremental cost in 2025, and others (LSP-07, LSP-10) were internal staff efforts not separately tracked to the LSPGC WMP budget. LSPGC anticipates that expenditures will increase as the Fern Road Substation becomes operational and both facilities require concurrent wildfire mitigation activities.

## 5. Performance Metrics Summary (2025)

The following performance metrics were tracked during the 2025 implementation period, consistent with the WMP:

Performance Metric	2025 Projected (WMP)	2025 Actual	Method of Verification
Number of utility-related ignitions	0	0	QDR
Number of outage events not caused by contact with vegetation	0	0	QDR

Grid inspection findings (any level)	2	1 (Non-HFTD, Transmission, Patrol Inspection; one consistent P3 finding identified across 210 assets inspected over 10 monthly inspections)	QDR Table 2
Vegetation-caused ignitions	0	0	Quarterly and annual data report
Vegetation-caused outages	0	0	Quarterly and annual data report
Open vegetation work orders	2 (per WMP Table 8-16)	1 (opened, work completed, and closed; zero open at year-end)	QDR Table 2

## 6. Summary of Key Deviations and Corrective Actions

**Overall Q4 QDR Initiative Status:** Of the eleven (11) WMP initiatives, ten (10) are reported as "Completed" in the Q4 2025 QDR, and one (1) – LSP-07 (Evaluate and enhance use of live video) – is reported as "In Progress," consistent with its ten-year completion timeline of December 2028.

**Fern Road Substation Energization Delay:** The WMP projected that the Fern Road Substation would be energized in late 2025. The facility remained under construction throughout the 2025 implementation period and is now expected to be energized in 2026. This is a construction timeline change resulting from ongoing construction activities, not a deliberate deferral of wildfire mitigation commitments. LSPGC will commence all applicable WMP activities at Fern Road Substation upon energization, including monthly substation inspections, vegetation management inspections, and camera installation.

**Substation Inspection Targets (LSP-02 and LSP-04):** The WMP established annual inspection targets of fifteen (15) inspections based on a full calendar year of operations at both substations. Because Orchard

Substation was energized in March 2025 and Fern Road Substation remained under construction, LSPGC completed ten (10) monthly inspections (per Q4 QDR cumulative Q1-4). LSPGC maintained a 100% monthly inspection cadence from the first month of operation. LSPGC will continue monthly inspections at Orchard Substation in 2026 and will commence inspections at Fern Road Substation upon energization, at which time LSPGC anticipates meeting or exceeding annual inspection targets.

**2025 Budget Variance:** Actual 2025 expenditure of approximately \$142.67K was approximately 43% below the \$250K planned budget. This is a timing variance primarily attributable to the Fern Road Substation remaining under construction, as detailed in Section 4 of this report. LSPGC remains committed to full implementation of all WMP initiatives and anticipates expenditures will increase as the Fern Road Substation becomes operational.

**CAISO Emergency Exercise:** WMP Section 8.4.2.3 described LSPGC's intent to participate in an annual emergency exercise with CAISO beginning in 2025. When the WMP was drafted, Orchard Substation and related operational readiness activities were still under development, and the intent was to align external exercise participation with available and applicable opportunities as LSPGC transitioned into operations. For calendar year 2025, LSPGC does not have CAISO-specific exercise documentation. During 2025, LSPGC advanced emergency preparedness through internal emergency readiness activities, including development and maturation of emergency procedures and internal drills/tabletop exercises, while prioritizing safe energization and operational readiness. LSPGC employees participated in an ERCOT emergency exercise in 2025, gaining transferable emergency response experience applicable across operational jurisdictions. LSPGC will continue to monitor and evaluate external emergency exercise opportunities, including those coordinated by CAISO, and will actively pursue participation when opportunities are available and applicable to LSPGC's California operations in 2026.