



April 3, 2026

Dear Stakeholders,

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Annual Performance Report regarding LS Power Grid's execution of its 2024 Wildfire Mitigation Plan.

This Annual Performance Report is published as of the date of this letter. LS Power Grid may, if it wishes to do so, file a public response to this Annual Performance Report within 14 calendar days of the date of publication. Comments must be submitted to the Energy Safety's E-Filing system in the 2024 Annual Performance Report docket.¹

Sincerely,

/s/ Patrick Doherty

Patrick Doherty

Program Manager | Performance Assessment Division
Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

¹ Submit responses to the 2024-[APR](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-APR) docket via the Office of Energy Infrastructure Safety's E-Filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-APR> .



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
2024 ANNUAL PERFORMANCE
REPORT
LS POWER GRID CALIFORNIA

April 2026

TABLE OF CONTENTS

- Executive Summary 1
- 1. Introduction 2
- 2. Performance Assessment Process 2
- 3. LSP 2024 Wildfire Mitigation Plan 3
- 4. LSP Annual Report on Compliance 4
- 5. Independent Evaluator ARC for LSP 5
- 6. WMP Initiative Attainment Performance 8
 - 6.1 LSP 2024 WMP Initiative Activities Assessed by Energy Safety 8
 - 6.2 Energy Safety Vegetation Management Audit Report 8
 - 6.3 Energy Safety Field Inspection Analysis 9
 - 6.4 LSP WMP Objective and Initiative Activity Attainment in 2024 9
 - 6.4.1 Impact of Initiatives with Missed Targets on Proposed Expenditures 9
 - 6.4.2 Impact of Initiatives with Missed Targets on Risk Reduction 10
 - 6.5 LSP 2024 WMP Expenditure Analysis 10
- 7. Ignition Risk Performance 11
- 8. Public Safety Power Shutoff Event Performance (PSPS) 11
- 9. Outcome Metric Performance 11
- 10. Reporting Accuracy and Completeness Performance 11
 - 10.1 QDR as compared to EC ARC 12
 - 10.2 VM Audit Report Identified Issues 13
 - 10.3 IE ARC Evaluation 13
 - 10.4 Comparison of Spatial and Tabular QDR Data 13
 - 10.5 Field Inspection Issues Identified 14
 - 10.6 Data Accuracy and Completeness Conclusions 14
- 11. Conclusion 15
- 12. References 16

13. Appendices.....20
Appendix A: LSP Information on WMP Initiative Activity Attainment20

LIST OF TABLES

Table 1. LSP WMP Initiatives with Missed Targets.....9
Table 2. Energy Safety Summary of Initiatives with Inconsistent QDR Reporting.....14
Table 3. References for Citations.....16
Table 4. WMP Initiative Activity Attainment Information20

LIST OF FIGURES

Figure 1. Spider Chart of QA/QC Maturity Model for LSP from IE ARC.....7

Executive Summary

Energy Safety's primary objective is to ensure that electrical corporations reduce wildfire risk and adhere to their approved Wildfire Mitigation Plans (WMPs),¹ which are annually filed pursuant to Public Utilities Code section 8385 *et seq.* Energy Safety's annual performance evaluation of LS Power Grid California (LSP) is a comprehensive look at the implementation of its 2024 WMP and its catastrophic wildfire risk reduction initiatives.

In terms of WMP initiative attainment, Energy Safety's assessment found that LSP completed three of four (75%) of its 2024 targets for initiative activities in its 2023-2025 Base WMP. LSP failed to meet its target for one of its 2024 WMP initiative activities to install cameras at both its Orchard and Fern substation sites. Only the Orchard site had camera installations completed in 2024, with conflicting reported actual units between spatial and non-spatial data submissions.

In 2024, LSP spent below its proposed amount, for initiatives applicable to 2024, by approximately \$26,000 (88% of the proposed budget). LSP explained that actual expenditures deviated from its proposed expenditure for various reasons, including that emergency preparedness activities required less resources than forecasted.

With respect to the ignition, PSPS, and outcome metric performance of LSP's system in 2024, there was no activity to report.

Energy Safety conducted its performance review processes through a variety of means including analysis of data submitted by LSP to Energy Safety. Energy Safety additionally reviewed LSP's self-assessment in its Electrical Corporation Annual Report on Compliance (EC ARC) and the findings of its independent evaluator (IE ARC).

The IE ARC also noted LSP's data inaccuracies, and limited application for quality assurance and quality control programs due to its lack of energized facilities. However, the IE ARC complimented LSP's preparation of procedures and protocols for when energization occurs.

Energy Safety acknowledges that in 2024, LSP undertook efforts to reduce its wildfire risk. However, there are still areas to improve upon and opportunities to continue learning. Specifically, Energy Safety expects LSP to improve the accuracy of its WMP implementation documentation going forward.

¹ Government Code Section 15475.1(a).

1. Introduction

This Annual Performance Report (APR) presents the Office of Energy Infrastructure Safety's (Energy Safety's) statutorily mandated assessment of LS Power Grid California's (LSP's) performance with its 2024 targets for initiatives and objectives in its 2023-2025 Base Wildfire Mitigation Plan (2023-2025 Base WMP). While the 2023-2025 Base WMP considers activities over a three- and 10-year horizon, this report only addresses targets established for initiatives and objectives to be executed in 2024. Therefore, this report uses the term "2024 WMP" to refer to portions of the 2023-2025 Base WMP addressed by this report.

In the sections that follow, Energy Safety describes the statutory and regulatory basis for its reporting, the 2024 WMP, the information supplied by LSP, the independent evaluation conducted by a third-party independent evaluator that examined LSP's implementation of its 2024 WMP, and how LSP's infrastructure performed in 2024 relative to four additional dimensions of wildfire risk. Finally, Energy Safety provides its conclusions and recommendations for further actions by LSP.

2. Performance Assessment Process

The statutory objective of electrical corporation wildfire mitigation planning efforts is to ensure that electrical corporations are constructing, maintaining, and operating their infrastructure in a manner that will minimize the risk of catastrophic wildfire.²

Government Code section 15475(b)(2) directs Energy Safety to develop performance metrics to achieve maximum feasible risk reduction to be used to develop the wildfire mitigation plan and evaluate an electrical corporation's performance relative to the implementation of that plan.

In this report, Energy Safety considers the totality of all performance assessments completed with respect to LSP's 2024 WMP. This includes all inspection, audit, investigation, and data analysis work performed by Energy Safety, as well as separate electrical corporation and independent third-party evaluations of implementation.

The following is an overview of the five dimensions of performance assessed by Energy Safety:

1. Energy Safety assessed *2024 WMP attainment performance* by determining whether the electrical corporation met the 2024 WMP targets for initiatives and objectives,

² Pub. Util. Code section 8386(a).

looking specifically at whether the electrical corporation funded and performed the work stated for each initiative, and by performing field inspections of WMP work claimed to be completed by LSP,

2. Energy Safety assessed *ignition risk performance* by tracking ignition rates, wire down rates, and unplanned outage rates – all indicators of ignition risk,
3. Energy Safety assessed *Public Safety Power Shut-off (PSPS) performance* by tracking the frequency, scope, duration, and impact of PSPS events,
4. Energy Safety assessed *outcome metric performance* by tracking the number of acres burned, number of buildings damaged or destroyed, number of fatalities or injuries, and total value of assets lost due to wildfires ignited by LSP’s equipment, and
5. Energy Safety assessed *data accuracy and completeness performance* by crosschecking data from various utility reporting mechanisms, assessing the accuracy of data submitted by LSP during field auditing of LSP’s WMP work, reviewing multiple reports, reviewing a formal quality assurance and quality control evaluation, and identifying issues encountered during the performance assessment process.

3. LSP 2024 Wildfire Mitigation Plan

LSP submitted a comprehensive WMP in 2023 covering a three-year term from 2023 through the end of 2025.³

Energy Safety approved LSP’s 2023-2025 Base WMP on January 30, 2024.⁴ For the purpose of this report, Energy Safety refers to the Base 2023-2025 WMP, any approved Change Order Requests, as well as the 2024 targets and initiatives, collectively as 2024 WMP.

LSP’s 2024 WMP highlighted past and ongoing efforts to address wildfire risk and reduce the impacts of PSPS events.⁵ The 2024 WMP described six initiatives with targets or objectives for 2024. However, two of the six initiatives were only applicable upon energization of facilities.⁶

⁷ Because LSP’s facilities were not energized in 2024, four initiatives from the 2024 WMP remained applicable, and are divided into two categories and summarized here:

1. Situational Awareness and Forecasting: Integrate StormGeo (LSP-05) to establish and maintain an environmental monitoring and weather forecasting program, and installation of substation cameras (32 cameras at each substation, for a total of 64

³ 2023-2025 Base WMP.

⁴ 2023-2025 Base WMP Approval.

⁵ 2023-2025 Base WMP, page 177.

⁶ Substation inspection program (LSP-2) and Regular inspections and establish buffer zones (LSP-4).

⁷ Decision for 2025 WMP Update, page 16.

cameras) (LSP-06) to evaluate the use of live video for remote monitoring of the substations.

2. Emergency Preparedness: Integrate into local dispatch systems (LSP-08) and establish annual contact with local fire agencies (LSP-09).

The 2024 WMP also contained three- and ten-year objectives. Selected three-year objectives included:⁸

- LSP-02 Implement substation inspection program.
- LSP-04 Establish risk-based buffer zones and implement monthly once operational.

Selected ten-year objectives included:⁹

- LSP-03 Enhance use of Computer Maintenance Management Systems (CMMS): incorporate enterprise asset management system into maintenance program to ensure system reliability and public safety.
- LSP-11 Best practice sharing: formalize mechanisms to share lessons learned among ITO peers.

Descriptions of the activities and objectives of the programs and initiatives contained in LSP's 2024 WMP are listed in the table in Appendix A.

4. LSP Annual Report on Compliance

Public Utilities Code section 8386.3(b)(1) directs electrical corporations to file a self-evaluation report addressing the electrical corporation's implementation of its approved plan during the prior calendar year. This document is known as the Electrical Corporation Annual Report on Compliance (EC ARC).

Energy Safety's Compliance Guidelines outlined the requirements for an EC ARC prepared to address the 2024 calendar year and filed by the electrical corporation in early 2025. The EC ARC was required to detail the electrical corporation's self-assessment of its performance with the 2024 WMP during 2024.¹⁰

LSP submitted its EC ARC to Energy Safety on March 31, 2025.¹¹ In summary, the EC ARC reported that LSP progressed on its 2024 WMP initiatives for situational awareness and emergency preparedness while its facilities were still under construction. LSP also reported

⁸ 2023-2025 Base WMP, pages 102-175.

⁹ 2023-2025 Base WMP, pages 102-176.

¹⁰ 2024 Compliance Guidelines.

¹¹ EC ARC.

progress on other 3-year objectives such as developing procedures for inspections and vegetation control, in preparation for facilities being energized in 2025.¹² The EC ARC also reported that one initiative regarding substation cameras (LSP-06) missed its target in 2024.

The EC ARC is considered by Energy Safety as well as by the independent evaluator in its assessment of LSP's WMP performance or evaluation of WMP implementation, respectively. For a summary of the EC ARC information on initiative completion and actual spending, see the table in Appendix A.

5. Independent Evaluator ARC for LSP

Energy Safety, in consultation with the Office of the State Fire Marshal, annually publishes a list of entities qualified to serve as independent evaluators of WMP compliance.¹³ Each electrical corporation is then required to hire an independent evaluator (IE) from the list to perform an annual independent WMP compliance evaluation.¹⁴

The IE reviews and evaluates the electrical corporation's compliance with its approved WMP. As part of its evaluation, the IE must investigate instances of large deviation in actual expenditure as compared to the proposed expenditure amount in the associated WMP.

The 2024 Independent Evaluator Annual Report on Compliance (IE ARC) for LSP was prepared by Bureau Veritas. The IE ARC included a review of the wildfire mitigation initiatives and activities implemented in 2024, and an accounting of whether LSP met its performance targets, deviated from its budget, and followed its quality assurance and quality control (QA/QC) processes.

The IE utilized a variety of techniques to analyze LSP's progress toward meeting its 2024 WMP commitments, such as inspecting a sample of LSP's field-verifiable 2024 WMP initiatives, performing desk reviews of non-field verifiable initiatives, interviewing selected utility staff, and reviewing the 2024 WMP and 2024 EC ARC.¹⁵ The IE evaluated a total of 11 initiatives, including general work not associated with initiatives with 2024 targets.¹⁶ The IE ARC includes sample verification statistics, an opinion on initiative completions, and actual expenditures for each initiative.¹⁷

¹² EC ARC, pages 5-9.

¹³ Pub. Util. Code Section 8386.3(b)(2)(A).

¹⁴ Pub. Util. Code Section 8386.3(b)(2)(B)(i).

¹⁵ IE ARC, page 8.

¹⁶ IE ARC, page 10.

¹⁷ IE ARC Appendix LSP Table 2.

The IE ARC identified one initiative with a 2024 target as incomplete. The IE ARC findings are summarized by initiative in Appendix A. The IE concluded that:

“LSP thoroughly displayed compliance with initiatives that could realistically be accomplished during the current operational phase and successfully demonstrated that procedures and protocols are established for when energization occurs. Many initiatives were deemed not applicable to the current review year due to the construction status of both the Orchard and Fern substations in 2024. LSP remains committed to enhancing its wildfire prevention approach by fulfilling necessary commitments as operational phasing allows, while also collaborating with local agencies.”¹⁸

The IE ARC identified the same initiative with a missed target as the EC ARC.

Install Substation Cameras – LSP-06: 29 cameras were installed at the Orchard Road substation out of the targeted 64 units (45%), the original target anticipated 32 cameras at each substation. However, design changes at the Orchard substation only required 29 cameras and construction of the Fern Road substation did not begin in 2024.¹⁹

Finally, the IE reviewed LSP’s QA/QC processes, assigning scores from 0 to 4 for five QA/QC Maturity Model metrics (Figure 1). For a full description of the QA/QC Maturity Model, see the IE ARC Outline and the IE ARC.^{20, 21}

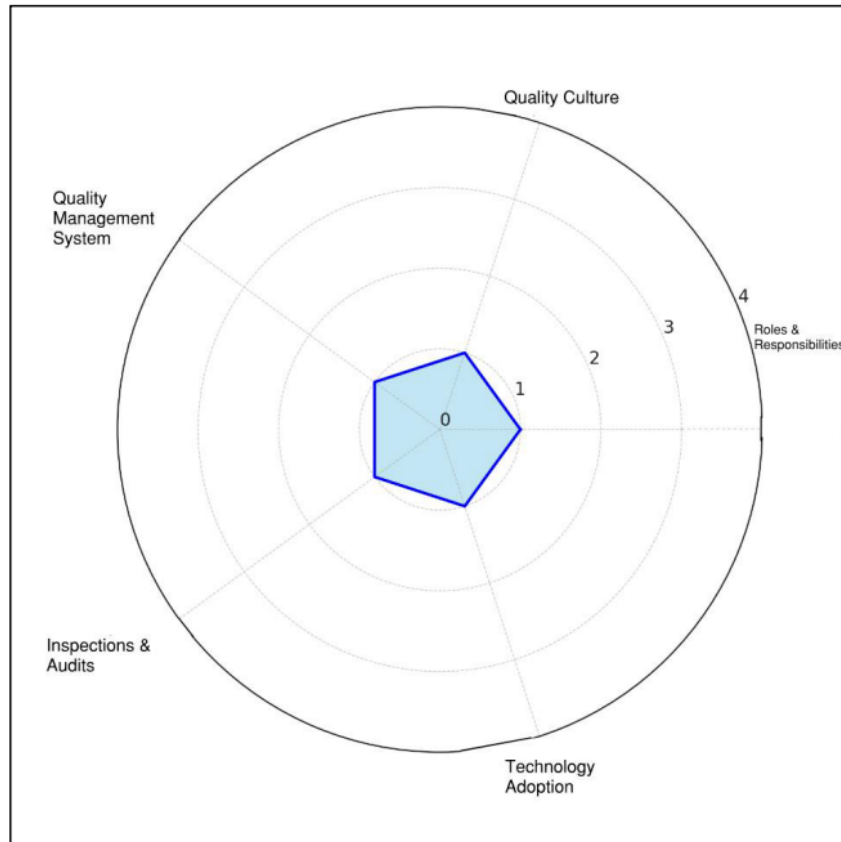
¹⁸ IE ARC, page 31.

¹⁹ IE ARC, page 19.

²⁰ IE ARC Outline, page 14.

²¹ IE ARC, pages 29-30.

Figure 1. Spider Chart of QA/QC Maturity Model for LSP from IE ARC²²



In the IE ARC, the IE concluded that LSP did not have a well-developed and documented QA/QC process for WMP initiative completion due to LSP not having any energized assets in 2024. For each QA/QC metric, the IE scored LSP a score of one out of a range of zero to four, noting that LSP has a process or documentation in place that meets the intent of the QA/QC process. However, as neither substation was in operation in 2024, there were no outcomes to score.²³

²² IE ARC, page 30.

²³ IE ARC, page 29.

6. WMP Initiative Attainment Performance

Energy Safety's assessment of LSP's performance in 2024 indicates that LSP attained three (75%) of its four targets for its 2024 WMP initiative activities. The subsections below further describe Energy Safety's assessment of LSP's execution of its 2024 WMP.

6.1 LSP 2024 WMP Initiative Activities Assessed by Energy Safety

Energy Safety assessed WMP attainment performance on four wildfire mitigation initiatives from the 2024 WMP.²⁴ The initiatives are grouped into two main categories:

1. Situational Awareness and Forecasting with two initiatives assessed and a proposed expenditure of approximately \$10,000.
2. Emergency Preparedness with two initiatives assessed and a proposed expenditure of approximately \$20,000.

A complete list of initiatives along with expenditure information appears in the table in Appendix A.

The initiative performance assessment process included comparing the actual initiative completion as reported by LSP in its quarterly data report (QDR) to Energy Safety and in its EC ARC, and as reported by the IE in the IE ARC.²⁵ The information from each of these sources is summarized along with the final assessment of performance for each initiative in the table in Appendix A.

6.2 Energy Safety Vegetation Management Audit Report

Each year, Energy Safety is required to perform an audit of the work performed by, or on behalf of, an electrical corporation with respect to the vegetation management commitments in its WMP following the end of the performance year.²⁶

However, because LSP did not have vegetation management targets or goals for 2024, Energy Safety did not conduct a vegetation management audit of LSP for the 2024 compliance year.

²⁴ 2023-2025 Base WMP.

²⁵ 2023 Q4 QDR; EC ARC; and IE ARC.

²⁶ Pub. Util. Code section 8386.3(b)(5)(A)

6.3 Energy Safety Field Inspection Analysis

Energy Safety did not conduct inspection activities of LSP's facilities for the 2024 compliance period.

6.4 LSP WMP Objective and Initiative Activity Attainment in 2024

Energy Safety assessed four wildfire mitigation initiatives for 2024 WMP attainment performance and found that one initiative activity target (25%) was missed. The one initiative activity with a missed target from LSP's 2024 WMP was to install 32 surveillance cameras at each of two substations (LSP-06), for a total of 64 cameras. A complete list of the initiative activities with missed targets is shown in Table 1. Section 6.4.1 elaborates on the financial impact of initiatives with missed targets on proposed expenditures, and Section 6.4.2 on the impacts of initiatives with missed targets on risk reduction, to measure the gap between LSP's WMP and its implementation.

Table 1. LSP WMP Initiatives with Missed Targets²⁷

Not Attained LSP 2024 WMP Initiative	2024 WMP Initiative Activity Target	Actual Performance
Install 32 surveillance cameras at each substation LSP-06	Target: 64 total	LSP's Q4 QDR reported 29/32 cameras installed at Orchard substation, and an initiative status of "complete" ²⁸ for this location. 0/32 cameras installed at Fern substation, due to facility construction that remained in progress in 2024.

6.4.1 Impact of Initiatives with Missed Targets on Proposed Expenditures

Energy Safety quantifies, on an annual basis, the budgetary impact of LSP 2024 WMP initiatives with missed targets. However, as LSP did not propose expenditure for its missed

²⁷ 2023-2025 Base WMP, p. 133.

²⁸ Q4 2024 QDR, Table 1; IE ARC, page 19.

regarding the installation of surveillance cameras, Energy Safety did not perform a budgetary impact analysis.

For an overview of the entire 2024 WMP proposed expenditures as compared to the actual expenditures, see Section 6.5.

6.4.2 Impact of Initiatives with Missed Targets on Risk Reduction

Energy Safety's WMP Technical Guidelines require an electrical corporation to estimate the relative risk impact of its mitigation activities by subtracting the remaining risk after the mitigation activity is completed from the risk that existed before the mitigation activity occurred. The electrical corporation is then to divide the risk difference by the risk before the mitigation activity, and finally, multiply the divided number by 100.²⁹

For LSP's one missed initiative to install substation cameras, there was no risk impact reported in its 2024 WMP, and therefore Energy Safety's did not conduct a risk reduction assessment for LSP's one missed initiative.³⁰

6.5 LSP 2024 WMP Expenditure Analysis

Energy Safety conducted an expenditure analysis to estimate LSP's spending alignment with its 2024 WMP. Unlike the assessment of the impact of initiatives with missed targets on proposed expenditures, this analysis considers all 2024 WMP initiatives and focuses on the gap between proposed and actual spending, as stated in the WMP. In addition, Energy Safety's analysis identifies spending deviations exceeding 10%, assessing how they impact LSP's planned spending accuracy.

According to LSP's Q1 QDR,³¹ LSP budgeted \$30,000 for its four 2024 WMP initiatives, representing 8% of LSP's total budget for wildfire mitigation for the 2023-2025 period.³² Proposed and actual expenditures may differ across the EC ARC, IE ARC, and Energy Safety's analysis as the EC ARC and the IE ARC may include financial amounts for initiatives that have no activity targets. The EC ARC reported \$5,000 (16%) spent of the \$30,000 proposed. The IE ARC reported \$4,000 (12%) spent of the \$30,000 proposed. Energy Safety's analysis concluded that \$4,000 (12%) was spent of the \$30,000 proposed.

Energy Safety assessed LSP's expenditures on individual 2024 WMP wildfire mitigation initiatives and found that 50% (two out of four) of the initiatives had actual expenditures that

²⁹ WMP Technical Guidelines, page 71.

³⁰ 2024 WMP, page 133.

³¹ Q1 QDR, Table 11.

³² LSP's Q1 2024 QDR, Table 11, accounts for \$390,000 in proposed expenditures for the 2023-2025 compliance period. This includes all initiatives, incremental expectations for 10-yr goals, and a separate expenditure amount for general "Wildfire Mitigation Strategy Development," not specific to an initiative or activity.

deviated more than 10% from those proposed. LSP explained that actual expenditures deviated from its proposed expenditure due to the initiative related to integration of StormGeo being less than projected, and the initiative related to integration into local dispatch systems requiring less resources than forecasted.³³ See Appendix A for a complete list of initiatives and their proposed and actual expenditures.

7. Ignition Risk Performance

Due to the LSP's infrastructure being under construction and not energized, Energy Safety did not conduct an ignition risk analysis for LSP in 2024. Energy Safety reviewed LSP's data and found that no ignitions occurred on LSP's infrastructure in 2024.

8. Public Safety Power Shutoff Event Performance (PSPS)

Due to the LSP's infrastructure being under construction and not energized, Energy Safety did not conduct a PSPS analysis for LSP in 2024. Energy Safety reviewed LSP's data and found that no PSPS events occurred on LSP's infrastructure in 2024.

9. Outcome Metric Performance

Due to the LSP's infrastructure being under construction and not energized, Energy Safety did not conduct an outcome metric analysis for LSP in 2024. Energy Safety reviewed LSP's data and found that no outcome metrics (acres burned, structures damaged/destroyed, injuries/fatalities, value of assets destroyed) occurred from LSP's infrastructure in 2024.

10. Reporting Accuracy and Completeness Performance

This section considers whether LSP exhibited issues related to its documentation of its implementation of its 2024 WMP. To accomplish this, Energy Safety holistically assessed all relevant information sources and assessments, including field verifications, for any systemic failings that may have hindered LSP's ability to record and report on its progress toward meeting its 2024 WMP target.

³³ EC ARC, page 8.

This issue is relevant to an electrical corporation's overall performance as the electrical corporation's awareness of the condition of its system, including the changes made to the system in the course of completing WMP work, impacts the situational awareness that the electrical corporation can attain. If an electrical corporation cannot accurately track WMP work and report on progress toward its WMP targets, this calls into question the ability of an electrical corporation to understand the actual risk posed by its equipment. In this section of the report, five dimensions of Reporting Accuracy and Completeness are combined to provide an assessment overall. The five dimensions are:

1. The consistency of data reporting between the QDR and the EC ARC is assessed for issues beyond routine data value updates,
2. Vegetation Management (VM) Audit Reports are reviewed for issues identified,
3. Findings from the IE ARC QA/QC program maturity model evaluations are summarized along with other IE ARC data issues observed,
4. Consistency between QDR tabular and QDR spatial reporting is reviewed, and
5. Data accuracy issues identified by the inspections team are reviewed.

10.1 QDR as compared to EC ARC

The purpose of the QDR Table 11 is to itemize WMP proposed expenditure amongst the WMP initiatives that apply and have an expenditure. While LSP's WMP proposed \$250,000 expenditure for 2024,³⁴ its QDR accounted for \$70,000.³⁵ In reviewing the \$70,000 proposed in the QDR, only \$30,000 applied to 2024 WMP initiative work (Appendix A). In addition to the dissonance in the WMP and QDR proposed expenditure, the EC ARC documented a different proposed expenditure as well. The EC ARC reported \$50,000 in proposed expenditure.³⁶

For initiative LSP-06 related to the installation of substation cameras, LSP did not provide proposed or actual expenditure in either its QDR or EC ARC. It is unclear why the expenditure for this initiative was not accounted for.

While LSP was aware of Q4 QDR actual expenditure data discrepancies, and submitted a revised dataset, the revised QDR still contained an inaccuracy for initiative LSP-05 related to integration of StormGeo.³⁷

LSP used dissimilar terminology for initiatives, and applicable targets and objectives, between its WMP, EC ARC, and QDR. For example, for initiative LSP-08, the WMP and EC ARC initiative activity is described as "integrate into local dispatch systems," but the QDR refers to

³⁴ 2024 WMP, page 14.

³⁵ 2024 Q4 QDR, Table 11.

³⁶ 2024 EC ARC, pages 8-9.

³⁷ LSP's Cover Letter for its revised QDR from July 16, 2025 states, "[t]his revision is to update a discrepancy in LS Power's 2024 Q4 table 11 actuals columns. While the table indicates that figures are in thousands, this convention was not applied to the 2024 actuals columns. This table has been updated to match the (1,000) unit convention and rounded down to the nearest dollar."

a “public emergency communication strategy.” Dissimilar terms such as these can interfere with conducting an accurate performance assessment.

10.2 VM Audit Report Identified Issues

LSP did not have vegetation management targets or goals for 2024; therefore, Energy Safety did not conduct a VM Audit of LSP for the 2024 compliance year.

10.3 IE ARC Evaluation

Regarding the discrepancy in reporting of the actual expenditure for LSP-05, where the Q4 QDR reported \$21,000 while the EC ARC reported \$2,500,³⁸ the IE ARC determined that the actual amount spent was \$1,082.50.³⁹

10.4 Comparison of Spatial and Tabular QDR Data

Pursuant to Energy Safety’s Data Guidelines, electrical corporations must submit quarterly data reports in both spatial and non-spatial (i.e., tabular) formats. Each of these quarterly reports must contain accurate information about the progress in meeting WMP targets throughout a compliance period.⁴⁰

Energy Safety analyzed the data submitted by LSP regarding the WMP work it completed in 2024, in both the spatial and tabular QDR submissions. Energy Safety found the following inconsistencies between spatial and tabular QDR submissions, which may call into question LSP data reporting practices and initiative attainment (Table 2).⁴¹ Of the identified initiatives with discrepancies, one has implications on initiative attainment performance.

With respect to risk events, the QDR data submissions for 2024 did not contain relevant updates.

³⁸ EC ARC, page 8.

³⁹ For Initiative LSP-05, the IE ARC, page 17 states, “QDR4 Table 11 and the Financial Evaluation Document reported \$21,228.74 for actual expenditure. However, DR005 clarified that this was inaccurately reported and the actual amount spent on LSP-05 for 2024 was \$1,082.50.”

⁴⁰ Data Guidelines.

⁴¹ For more information regarding the unmet initiatives, see Appendix A.

Table 2. Energy Safety Summary of Initiatives with Inconsistent QDR Reporting

Initiatives with Inconsistent QDR Reporting	2024 WMP Target ⁴²	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%)
Install substation cameras LSP-06	64 cameras total	29 cameras	9 cameras ⁴³	69% LSP did not provide an explanation for this deviation in its Q4 QDR spatial and non-spatial data submissions.

10.5 Field Inspection Issues Identified

For the 2024 compliance period, Energy Safety did not conduct inspection activities of LSP's facilities.

10.6 Data Accuracy and Completeness Conclusions

Energy Safety found that LSP's documentation and reporting in 2024 on targets and actual attainments for work and expenditure were inconsistent, primarily with its tabular and spatial QDRs. Energy Safety's assessment of all the initiatives by data source can be found in Appendix A.

Taken together, this analysis shows that LSP's reporting accuracy and completeness performance was inadequate. LSP must continue to improve the accuracy of its WMP implementation documenting practices. Energy Safety will monitor LSP's reporting and expects improvements regarding the accuracy of LSP's documentation and tracking processes going forward.

⁴³ Q4 2024 QDR Spatial Data Status Report denoted a spatial data submission to Energy Safety regarding cameras.

11. Conclusion

Energy Safety makes the following observations and recommendations regarding LSP's execution of its WMP initiative activities and the performance of its infrastructure relative to its wildfire risk in 2024.

In terms of WMP initiative attainment, Energy Safety's assessment found that LSP completed three of four (75%) of its 2024 targets for initiative activities in its 2023-2025 Base WMP. LSP failed to meet its target for one of its 2024 WMP initiative activities to install cameras at both its Orchard and Fern substation sites. Only the Orchard site had camera installations completed in 2024, with conflicting reported actual units between spatial and non-spatial data submissions.

In 2024, LSP spent below its proposed amount, for 2024 applicable initiatives, by approximately \$26,000 (88% of the proposed budget). LSP explained that actual expenditures deviated from its proposed expenditure for various reasons, including but not limited to situational awareness expenditures being less than projected and emergency preparedness activities requiring less resources than forecasted.

With respect to the ignition, PSPS, and outcome metric performance of LSP's system in 2024, there was no activity to report.

Energy Safety conducted its performance review processes through a variety of means including analysis of data submitted by LSP to Energy Safety. Energy Safety additionally reviewed LSP's self-assessment in its EC ARC and the findings of its independent evaluator.

The IE ARC also noted LSP's data inaccuracies, and limited application of QA/QC programs due to its lack of energized facilities. However, the IE complimented LSP's preparation of procedures and protocols for when energization occurs.

Energy Safety acknowledges that in 2024, LSP undertook efforts to reduce its wildfire risk. However, there are still areas to improve upon and opportunities to continue learning. Specifically, Energy Safety expects LSP to improve the accuracy of its WMP implementation documentation going forward.

12. References

Table 3. References for Citations

Citation	Reference
2023-2025 Base WMP	LS Power Grid California, “ 2023-2025 Base Wildfire Mitigation Plan ,” Published February 15, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56319&shareable=true).
2023-2025 WMP Approval	Office of Energy Infrastructure Safety, “ LS Power Grid 2023-2025 WMP Decision and Cover Letter ,” Published January 30, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true).
2024 IE ARC Outline	Energy Safety, “ Independent Evaluator Outline ,” Published December 12, 2024, URL: (https://caleprocure.ca.gov/event/3355/0000033680).
2024 Q1 QDR	LS Power Grid California, “ LSPGC 2024 Q1 Tables 1-15 ,” Published May 14, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56673&shareable=true).
2024 Q4 QDR	LS Power Grid California, “ LSPGC 2024 QDR Q4 R1 ,” Published July 16, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58932&shareable=true).
2024 Q4 QDR Cover Letter	LS Power Grid California, “ LSPGC 2024 Q4 QDR R1 Cover Letter ,” Published July 16, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58931&shareable=true).
2024 Q4 QDR Spatial Data	LS Power Grid California, “ LSPGC 2024 Spatial Data Status Report ,” Published February 3, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57956&shareable=true).

Compliance Guidelines	Office of Energy Infrastructure Safety, “ Compliance Guidelines ,” Published September 2023, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true).
Compliance Process	Office of Energy Infrastructure Safety, “ Compliance Process ,” Published September 2024, URL: (https://energysafety.ca.gov/wp-content/uploads/2024/12//2024-wmp-compliance-process.pdf).
CPUC HFTD Designation	California Public Utilities Commission, “ Fire-Threat Maps and Fire-Safety Rulemaking ,” Accessed July 28, 2025, URL: (https://www.cpuc.ca.gov/industries-and-topics/wildfires/fire-threat-maps-and-fire-safety-rulemaking).
Data Guidelines	Office of Energy Infrastructure Safety, “ Data Guidelines v3.2 ,” Published January 30, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56226&shareable=true).
Decision for 2025 WMP Update	Office of Energy Infrastructure Safety, “ Decision for 2025 WMP Update ,” Published February 18, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57985&shareable=true).
EC ARC	LS Power Grid California, “ LS 2024 ARC 20250331 ,” Published March 31, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58175&shareable=true).
IE ARC	Bureau Veritas, “ LS Power Grid 2024 Independent Evaluator Report on Compliance ,” Published July 23, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58980&shareable=true)
Pub. Util. Code	Public Utilities Code, URL: (https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=PUC&tocTitle=+Public+Utilities+Code+-+PUC).

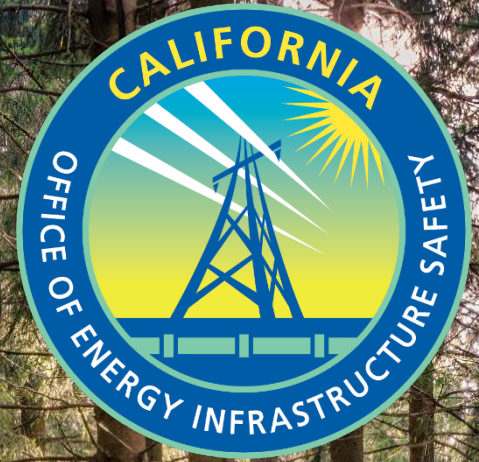
DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



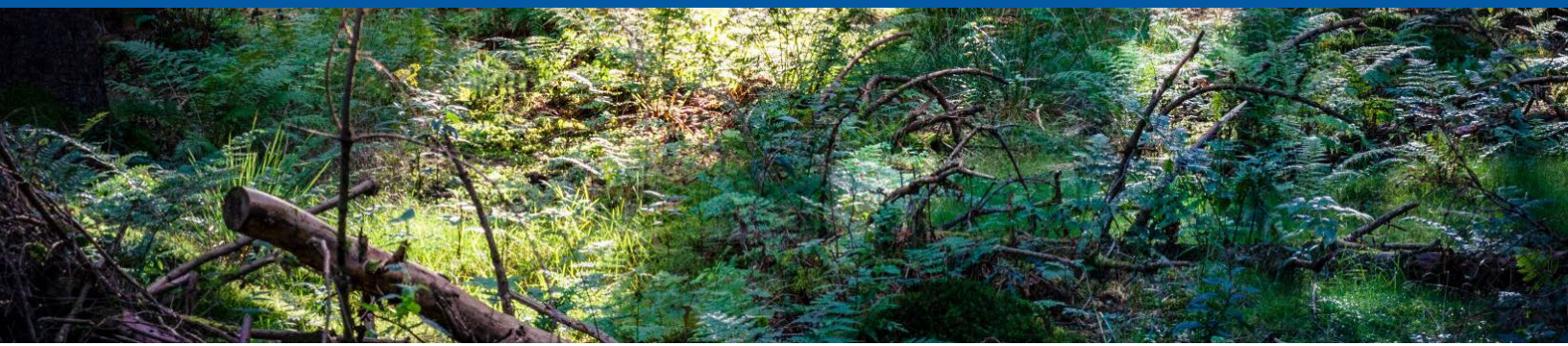
OFFICE OF ENERGY INFRASTRUCTURE SAFETY
A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 15th Floor
Sacramento, CA 95814





APPENDICES



13. Appendices

Appendix A: LSP Information on WMP Initiative Activity Attainment

Table 4 summarizes each of LSP's four initiative activity targets from its 2024 WMP, LSP's self-reporting on performance contained in its QDR, EC ARC, and IE ARC.⁴⁴

Table 4. WMP Initiative Activity Attainment Information⁴⁵

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure ⁴⁶	Actual Expenditure ⁴⁷
Integrate StormGeo LSP-05	Full integration of the weather forecasting tool, StormGeo	Met Target: 100% integration Actual: 100% integration	Met Target: 100% integration Actual: 100% integration	Met Target: N/A Actual: N/A	Met	\$10,000	\$1,082.50
Install substation cameras LSP-06	Install 32 surveillance cameras at each substation, for a total of 64 ⁴⁸	Met Target: 29 Actual: 29	Met Target: 29 Actual: 29	Not met Target: 64 Actual: 29	Not Met ⁴⁹	\$0.00	\$0.00 ⁵⁰

⁴⁴ Q4 QDR, EC ARC, IE ARC.

⁴⁵ This table includes all initiative activities that had targets for the 2024 calendar year but does not include initiative activities for which LSP had proposed or actual expenditures and no targets for the 2024 calendar year.

⁴⁶ Q1 QDR, Table 11.

⁴⁷ IE ARC.

⁴⁸ Design changes during construction of the Orchard Road substation reduced the number of needed surveillance cameras to 29, and the Fern Road substation had not begun construction 2024.

⁴⁹ Based on Q4 2024 QDR, Table 11, reporting of 29 units, and Q4 2024 spatial reporting of 9 units (Section 10.4).

⁵⁰ The IE ARC, page 19, notes confirmation of initiative work, "based on submitted financial documentation demonstrating the purchase and commissioning of 29 CCTV units for the Orchard substation." However, the actual expenditure was not provided for reference.

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure ⁴⁶	Actual Expenditure ⁴⁷
Integrate into local dispatch systems LSP-08	Integrate into local dispatch systems	Met Target: Integrate into local dispatch systems Actual: Complete	Met Target: Integrate into local dispatch systems Actual: Verified substation locations were accurately captured in the local dispatch systems	Met Target: N/A Actual: Validated	Met	\$20,000	\$2,416.20
Establish annual contact with local fire agencies LSP-09	Two meetings with fire agencies	Met Target: 2 meetings Actual: 2 meetings	Met Target: 2 Actual: 6	Met Target: 2 Actual: 6	Met	\$0.00	\$0.00