Caroline Thomas Jacobs, Director

OFFICE OF ENERGY INFRASTRUCTURE SAFETY

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November 4, 2021

GUIDANCE ON COMPLIANCE WITH ENERGY SAFETY NOTIFICATION REGULATIONS

BACKROUND

On September 13, 2021, pursuant to Government Code Sections 11346.1 and 11349.6, the Office of Administrative Law (OAL) approved the Office of Energy Infrastructure Safety's (Energy Safety) emergency regulations governing its rules of practice and procedure (RPP). This OAL action adopted into Title 14, California Code of Regulations (CCR), Sections (§§) 29000 through 29302.¹

Under the provisions of Energy Safety's RPP, §29300, regulated entities are required to notify Energy Safety within 12 hours of observing:

- A fault, outage, or other anomaly that may lead to a fault or outage on infrastructure it owns or operates occurring within the vicinity of a fire requiring response from a fire suppression agency; or
- 2. A wildfire threat that poses a danger to infrastructure it owns or operates requiring a response from a fire suppression agency.

Additionally, under the same provision, regulated entities must notify Energy Safety within four hours of receiving notice that infrastructure it owns or operates is being investigated by a governmental agency for involvement in potentially causing an ignition.

This guidance document provides additional direction and clarification to regulated entities for compliance with the above notification requirements.

NOTIFICATION CONTENT

In keeping with its objectives to make data-driven decisions and to pursue continuity in data reporting, Energy Safety requires regulated entities to provide a written narrative transmitted via electronic mail and data attached in a Microsoft Excel spreadsheet template. At a minimum, the written narrative must include the following:

- 1. The date and time of the incident
- 2. The location of the incident (i.e., latitude/longitude, address, cross streets, city, county, etc.) to the greatest granularity/detail known
- 3. The circuit(s) involved in the incident, including circuit voltage
- 4. Whether the location is in a High Fire Threat District area, and if so, which tier

¹ OAL Matter Number: 2021-0903-01.

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- 5. Whether there were any circuit interruptions, including the number of customers impacted and duration (in customer minutes interrupted), if there were any interruptions?
- 6. The name of the responding lead fire suppression agency
- 7. Fire size, if suppressed and known at time of notification
- 8. Whether there were any reported injuries, fatalities, or property damage resulting from the incident
- 9. A summary of facts regarding the incident known at the time of reporting, including but not limited to, suspected cause, asset/structure IDs of involved infrastructure, and third-party involvement (if applicable)

In addition to the written narrative, notifications submitted pursuant to Energy Safety's RPP, §29300 shall also include an attached Excel spreadsheet with data pertinent to the notice. To ensure consistency in data reporting and to minimize user entry errors, regulated entities are required to use a template provided by Energy Safety, as detailed in Attachment A.² The template spreadsheet includes drop-down menus for certain fields with preset values to choose from. Regulated entities must enter values in the spreadsheet for all fields where information is known, but at a minimum, must provide values in all fields marked as "Required." The field values in the spreadsheet are largely modeled from the "Ignitions" data schema in the Energy Safety GIS Data Reporting Standard with some modifications to accommodate data specific to notifications.³

In general, Energy Safety expects each notification submitted pursuant to its RPP, §29300 to be accompanied by a written narrative, as detailed above, and include a single row of data submitted with the template provided by Energy Safety and including all required data, at a minimum. However, in some situations when extreme weather events occur, it may be possible that several events meeting the Energy Safety notification requirements occur simultaneously. In such situations, it is permissible for regulated entities to submit a single notification (i.e., one written narrative and a single spreadsheet), granted that each qualifying event is clearly demarcated in the written narrative and a unique row is provided in the spreadsheet for each event.

² A Microsoft Excel version of this template is being transmitted to regulated entities with the service of this guidance document.

³ The Energy Safety GIS Data Reporting Standard is available through the "Data" case on Energy Safety's e-Filing System at: https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51719&shareable=true.



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SUBMISSION

Energy Safety directs regulated entities to submit notifications pursuant to the requirements of RPP \$29300 via electronic mail to the following inboxes:

- 1. <u>Compliance@energysafety.ca.gov</u>
- 2. <u>Data@energysafety.ca.gov</u>
- 3. Energy Safety, Director (caroline.thomasjacobs@energysafety.ca.gov)
- 4. Compliance Assurance Division, Program Manager (koko.tomassian@energysafety.ca.gov)
- 5. Data Analytics Division, Data Manager (Stephen.lai@energysafety.ca.gov)

Sincerely,

Koko Tomassian

Program Manager, Compliance Assurance Division

Cc: Caroline Thomas Jacobs, Director, Energy Safety Stephen Lai, Data Manager, Energy Safety



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ATTACHMENT A

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ENERGY SAFETY NOTIFICATION DATA SPREADSHEET TEMPLATE

Below are details on the schema Energy Safety notification data spreadsheet template. A blank template of this spreadsheet is provided to all regulated entities with the issuance of this guidance document. All regulated entities must complete all required fields upon submission of a notification, as well as any additional fields with known data.

Field Name	Field Description	Required ¹
Notification Date	Date the notification was sent to Energy Safety, in MM/DD/YYY, 00:00 AM/PM format (e.g., 11/01/2021, 01:35 PM).	Yes
Notification Type	Regulatory requirement under which the notification is provided. Possible values: • 29300(a)(1) • 29300(a)(2) • 29300(b)	Yes
Utility ID	Standardized identification name of the utility. Possible values: BV HWT Liberty PacifiCorp PG&E SCE SDG&E TBC	Yes
Confidential	Does the regulated entity consider this record confidential? Possible values: • Yes • No	Yes

¹ Fields with "Possibly" noted for this column are potentially required depending on the circumstances of the event leading to the notification. For example, a "Transmission Outage ID" is only required if the involved infrastructure is on the transmission system and an outage is observed. Conditional requirements are explained in the "Field Description" column for each field value.



Field Name	Field Description	Required ¹
Incident Start Date and Time	Date and time the regulated entity observed the outage, fault, anomaly, wildfire threat to infrastructure, or was notified by a governmental agency of its infrastructure being investigated for causing an ignition, which led to the need for the notification. Date and time must be submitted in MM/DD/YYY, 00:00 AM/PM format (e.g., 11/01/2021, 01:35 PM).	Yes
Incident Start Year	Year (in YYYY format) the regulated entity observed the outage, fault, anomaly, wildfire threat to infrastructure, or was notified by a governmental agency of its infrastructure being investigated for causing an ignition, which led to the need for the notification.	Yes
County	County where the event requiring notification occurred.	Yes
District	Operating district where the event requiring notification occurred.	Yes
Latitude	Latitude of event point (in decimal degrees).	Yes
Longitude	Longitude of event point (in decimal degrees).	Yes
HFTD Class	The CPUC high-fire threat district (HFTD) area the event requiring notification intersects. For this data, anything outside Tiers 2 and 3 must be categorized as "Non-HFTD." Do not record any Zone 1 values. HFTD data can be downloaded from: https://ia.cpuc.ca.gov/firemap . Possible values: Tier 3 Tier 2 Non-HFTD 	Yes



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Field Name	Field Description	Required ¹
Origin Land Use	Status of land at the origin of the event requiring notification. Possible values: Rural Urban	No
	Urban is defined as more than 1,000 people per square mile using U.S. Census data at the tract level or smaller units. All other areas will be considered rural.	
Material at Origin	 Fuel material at the event origin. Possible values: Vegetation Structure Other – See comment 	No
Material at Origin Comment	Fuel material not listed in the above options. This field should only have information if a value is entered and "Other – See comment" is selected for "Material at Origin."	No
Fuel Bed Description	 Type of fuel bed existing at the event location. Possible values: Fire-resistive fuel bed - Fuel bed not conducive to propagating fire where damage occurred (e.g., asphalt, concrete, gravel, etc.). Grass fuel model - Fuel bed comprised of annual grasses where damaged occurred. Brush fuel model - Fuel bed comprised of mainly brush or shrubs where damage occurred (e.g., chamise, manzanita, chaparral, scotch broom, etc.). Timber fuel model - Fuel bed comprised of a timber where damaged occurred (e.g., forests, timber litter, logging slash, etc.). Other - See comment 	No
Fuel Bed Description Comment	Fuel bed description not listed in the above options. This field should only have information if a value is entered and "Other – See comment" is selected for "Fuel Bed Description."	No



Field Name	Field Description	Required ¹
Circuit ID	ID of circuit(s) associated with involved infrastructure. This will be a unique standardized identification name of the circuit(s). This field value must correspond with matching field values provided pursuant to the Energy Safety GIS Data Reporting Standard.	Yes
Circuit Voltage	Voltage (in kilovolts) associated with the circuit. Do not use more than two decimal places.	Yes
Substation ID	Unique ID of the substation supplying the involved circuit. This field value must correspond with matching field values provided pursuant to the Energy Safety GIS Data Reporting Standard.	Yes
Nearest Weather Station ID	Unique ID of weather station closest to the infrastructure subject to the notification. This field value must correspond with matching field values provided pursuant to the Energy Safety GIS Data Reporting Standard.	Yes
RFW Status	Was there a red flag warning (RFW) issued by the National Weather Service (NWS) in effect at the event location at the time of the event? Possible values: • Yes • No	Yes
RFW Issue Date and Time	The date and time when the NWS issued the RFW in effect at the event location at the time of the event. This field is only required if "Yes" is selected for the "RFW Status" field.	Possibly
FWW Status	Was there a fire weather watch (FWW) issued by the NWS in effect at the event location at the time of the event? Possible values: • Yes • No	Yes
FWW Issue Date and Time	The date and time when the NWS issued the FWW in effect at the event location at the time of the event. This field is only required if "Yes" is selected for the "FWW Status" field.	Possibly



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Field Name	Field Description	Required ¹
HWW Status	Was there a high wind warning (HWW) issued by the NWS in effect at the event location at the time of the event? Possible values: • Yes • No	Yes
HWW Issue Date and Time	The date and time when the NWS issued the HWW in effect at the event location at the time of the event. This field is only required if "Yes" is selected for the "HWW Status" field.	Possibly
Detection Method	The method by which the regulated entity first learned of the outage, fault, anomaly, wildfire threat to infrastructure, or was notified by a governmental agency of its infrastructure being investigated for causing an ignition, which led to the need for the notification. Possible values: • Camera • Fire agency • Public • Satellite • Utility staff • Other – See comment	Yes
Detection Method Comment	Detection method description not listed in the above options. This field is only required if "Other – See comment" is selected for the "Detection Method" field.	Possibly
Fire Size	Size, in acres unless otherwise indicated, of fire resulting from the event requiring notification. Possible values: • Structure only • < 3 meters linear travel • < 0.25 • 0.26-9.99 • 10-99 • 100-299 • 300-999 • 1,000-4,999 • 5,000+ • Unknown	Yes



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Field Name	Field Description	Required ¹
Suppressed By	Entity responsible for suppressing the event requiring notification. Possible values: Customer Fire agency Self-extinguished Utility Unknown	Yes
Suppressing Agency	If the "Suppressed By" field has the value of "Fire agency", enter the fire department name.	Possibly
Fire Investigation	Whether the fire authority having jurisdiction investigated the event requiring notification and the status of the investigation. Possible values: • Yes – Complete • Yes – Pending • No	Yes
Fire AHJ	The investigating fire agency name. This field is only required if "Yes – Complete" or "Yes – Pending" is selected for the "Fire Investigation" field.	Possibly
Outage Status	Was there an outage associated with the event requiring notification? Possible values: • Yes • No	Yes
TOutage ID	A unique ID for the transmission outage event. This field value must correspond with matching field values provided pursuant to the Energy Safety GIS Data Reporting Standard. This field is only required if transmission infrastructure is involved, and "Yes" is selected for the "Outage Status" field.	Possibly
DOutage ID	A unique ID for the distribution outage event. This field value must correspond with matching field values provided pursuant to the Energy Safety GIS Data Reporting Standard. This field is only required if distribution infrastructure is involved, and "Yes" is selected for the "Outage Status" field.	Possibly



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Field Name	Field Description	Required ¹
Suspected Initiating Cause	Suspected initiating event of the outage, fault, anomaly, wildfire threat to infrastructure, or was notified by a governmental agency of its infrastructure being investigated for causing an ignition, which led to the need for the notification. Possible values: Object contact Equipment failure Wire-to-wire contact Contamination Normal operation Vandalism/theft Lightning Unknown Other – See comment	Yes
Suspected Initiating Cause Comment	Suspected initiating event not listed in the above options. This field is only required if "Other – See comment" is selected for the "Suspected Initiating Cause" field.	Possibly
Determination	The entity relied upon to make the determination used to fill in the value of the "Suspected Initiating Cause" field above. Possible values: Utility personnel Fire agency Other – See comment	Yes
Determination Comment	Entity relied upon for determination not listed in the above options. This field is only required if "Other – See comment" is selected for the "Determination" field.	Possibly



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Field Name	Field Description	Required ¹
Equipment Failure	Description of equipment involved in the event if "Equipment failure" is the value of the "Suspected Initiating Cause" field. If "Equipment failure" is not the value of the "Suspected Initiating Cause" field, enter "N/A." Possible values:	Yes
Equipment Failure	Equipment involved in the event if not listed above.	Possibly
Comment	This field is only required if "Other – See comment" is selected for the "Equipment Failure" field.	



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Field Name	Field Description	Required ¹
Object Contact	Description of the object involved in contact "Object contact" is the value of the "Suspected Initiating Cause" field. If "Object contact" is not the value of the "Suspected Initiating Cause" field, enter "N/A." Possible values: • Vegetation • Animal • Balloon • Vehicle contact – car pole • Vehicle contact – aircraft • 3rd part facility • Unknown • N/A • Other – See comment	Yes
Object Contact Comment	Description of object involved in contact if not listed above options. This field is only required if "Other – See comment" is selected for the "Object Contact" field.	Possibly



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Field Name	Field Description	Required ¹
Facility Contacted	The first facility that was contacted by an outside object. Only to be used if "Object contact" is selected as the value of the "Suspected Initiating Cause" field. Possible values: Bushing mounted cutout Capacitor bank Communications line Conductor - Primary Conductor - Secondary Conductor - Transmission Crossarm Fuse Guy/span wire Insulator Jumper Support structure (pole or tower) Pothead Recloser Riser Service connector Service drop Splice/clamp/connector Switch Tie wire Transformer Voltage regulator Other - See comment	Possibly
Facility Contacted Comment	Any contacted facility that is not listed above. If multiple facilities listed above were contacted, list them here.	Possibly
Additional Notes	Additional information regarding the event requiring notification that is not included in this schema.	No