



2021 WILDFIRE MITIGATION PLAN CHANGE ORDER DECISION

Utility 2021 Wildfire Mitigation Plan Change Order Determinations

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EXECUTIVE SUMMARY

The Office of Energy Infrastructure Safety (Energy Safety) evaluated the change orders pertaining to the 2021 Wildfire Mitigation Plan (WMP) Updates that Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and PacifiCorp submitted for review on November 1, 2021. Liberty Utilities and Bear Valley Electric Service, Inc., reported no change orders to their 2021 WMP Updates.

This Decision provides Energy Safety’s determination for each of the proposed initiative changes. Determinations are categorized as Approved, No Change Necessary, or Reject.



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1. RESULTS

1.1 Office of Energy Infrastructure Safety Response to Change Order Reports for the 2021 Wildfire Mitigation Plan Updates

Energy Safety made its determinations as set forth in Table 1 below. For a determination of “no change necessary,” Energy Safety concluded that the change order and associated updated target, if applicable, was not necessary because it did not relate to a utility’s updated risk assessment or differing understanding of risk. If a utility under- or over-performed a target for 2021, it may provide additional explanation in its compliance reporting explaining the circumstances for which it did not meet its targets. However, it is not necessary for Energy Safety to change the utility’s initiative target unless the change is specifically related to a new or changed understanding of risk.

Table 1-1. Determination Types, Rationale, and Consequences

Determination	Rationale	Initiative Target(s)
Approved	Requested change related to updated wildfire risk assessment and will reduce wildfire risk.	Targets change to the targets requested by the utility in its change order
No Change Necessary	Requested change not related to updated wildfire risk assessment.	Targets remain the same as presented in 2021 WMP Update
Reject	Requested change related to updated wildfire risk assessment but will not reduce wildfire risk.	Targets remain the same as presented in 2021 WMP Update

The tables below provide Energy Safety’s determination for each utility requested change order, presented by utility.

Table 1-2. PG&E Change Orders

PG&E Initiative	Change	Determination
7.3.3.6 - Distribution pole replacement and reinforcement, including with composite poles	Increase in cost due to increased unit cost for pole replacements.	No Change Necessary
7.3.3.8.3 Distribution Line Motorized Switch Operator (MSO) Pilot	Update the MSO pilot goal (for which there was no target) to establish a quantitative target of replacing 48 MSO devices by December 31, 2021.	Approved
7.3.3.11.1 Mitigation of impact on customers and other residents affected during PSPS event. Generation for PSPS Mitigation.	Increase in cost of microgrids.	No Change Necessary
7.3.3.12.4 Other corrective action, Maintenance, Distribution	Increased number of tags discovered during emergency work, resulting in cost increase and projected risk reduction.	Approved
7.3.3.15 Transmission tower maintenance and replacement	Increase in cost to complete Ignacio-Mare Island tower replacements and 8 towers identified as needing replacement within 1 year.	No Change Necessary
7.3.4.1 Detailed Inspections of Distribution Electric Lines and Equipment	Increase in poles requiring detailed inspection by 75,000 poles due to estimates moving to actual values.	Approved
7.3.4.2 Detailed Inspections of Transmission Electric Lines and Equipment	Increase in poles requiring detailed inspections by 2,800 poles due to estimates moving to actual values.	Approved
7.3.4.5 Infrared (IR) Inspections of Transmission Electric Lines and Equipment	Decrease in IR inspections system-wide, increase in IR inspections in the high fire threat district (HFTD).	Approved

PG&E Initiative	Change	Determination
PSPS Protocols and Targets	Update to PSPS Protocols to include tree overstrike and priority tags into model. Provide PSPS projections based on the updated PSPS Protocols from the California Public Utilities Commission (CPUC).	Approved

Table 1-3. SCE Change Orders

SCE Initiative	Change	Determination
7.3.3.16 Undergrounding of Overhead Conductor (SH-2)	Decrease in forecasted expenditure for 2021	No Change Necessary
7.3.4.9.1 Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, IN-1.1	Decrease in scale of remediations and change-cost efficiency.	No Change Necessary
7.3.4.10.1 Transmission High Fire Risk-Informed (HFRI) Inspections and Remediations, IN-1.2	Decrease in scale of remediations and change-cost efficiency.	No Change Necessary
7.3.5.16.1 Hazard Tree Mitigation Program (HTMP), VM-1	Fewer tree assessments, decreased expenditure for 2021.	No Change Necessary
7.3.5.16.2 Dead and Dying Tree Removal, VM-4	Fewer tree removals, decreased expenditure for 2021.	No Change Necessary
7.3.6.5.2 Customer Care Programs, PSPS-2	Enhancements to PSPS website and processes; Expanding Critical Care Backup Battery program; Modifications to Residential Battery Station and Well Water and Water Pumping Backup Generation programs	No Change Necessary

Table 1-4. SDG&E Change Orders

SDG&E Initiative	Change	Determination
7.3.3.8.2 Microgrids	Remove Cameron South microgrid from scope; Sherilton Valley microgrid put on hold	Approve Cameron South; No Change Necessary for Sherilton Valley
7.3.3.11.3 Resiliency Assistance Programs	Reduce target for generator rebates	No Change Necessary
7.3.3.16 Strategic Undergrounding	Reduce forecasted costs	No Change Necessary
7.3.3.18.2 Lightning Arrestor Removal and Replacement	Increase in scale	No Change Necessary
7.3.4.9.4 Drone Assessment of Transmission	Decrease in scale	Approve

Table 1-5. PacifiCorp Change Orders

PacifiCorp Initiative	Change	Determination
7.3.2.1 Advanced Weather Monitoring and Weather Stations	Additional weather stations planned for deployment in 2022 (1 additional in 2021, and 6 additional in 2022). No cost increase in 2021.	Approve 2021 changes; No Change Necessary for 2022 target increase
7.3.2.3 Fault Indicators for Detecting Faults on Electric Lines and Equipment	New initiative to install Communicating Fault Current Indicators (CFCI) prior to the 2022 fire season on circuits where more sensitive settings may be deployed during heightened risk. Increase budget by \$750k in 2021.	No Change Necessary ¹
7.3.3.3 Installation of Covered Conductor	Decrease in anticipated 2021 covered conductor scope based on unanticipated increase in costs and a delay in deployment timing due to unanticipated delivery challenges.	No Change Necessary
7.3.3.6 Distribution Pole Replacement and Reinforcement, including with composite poles	Increase in pole replacements, partially due to better alignment with covered conductor installation.	No Change Necessary; PacifiCorp must report in 2022 WMP Update
7.3.3.7 Expulsion Fuse Replacement	Increase in expulsion fuse replacement scope due to decoupling from covered conductor. Increase of \$50K in 2021.	Approve 2021 changes; No Change Necessary for 2022 changes
7.3.3.11 Mitigation of Impact on Customers and Other Residents Affected During a PSPS Event – Part A	Increase in scale: new program to facilitate new generator rebate program in high fire threat districts. Increase of \$28k in 2021.	No Change Necessary

¹ While Energy Safety appreciates PacifiCorp's development of new safety initiatives above and beyond those discussed in its 2021 WMP Update, the added cost of this initiative is too significant to approve through a change order. Energy Safety will evaluate this new initiative in the context of PacifiCorp's 2022 WMP Update.

PacifiCorp Initiative	Change	Determination
7.3.3.11 Mitigation of Impact on Customers and Other Residents Affected During a PSPS Event – Part B	Increase in scale: new program to offer portable batteries to all medically dependent customers in Tier II and III high fire threat districts. Increase of \$141k in 2021.	No Change Necessary
7.3.7.1 Central Repository for Data	Increase resources specifically to manage and deliver complex datasets on a quarterly basis consistent with the GIS Data Schema requirements and the Compliance Operational Protocols.	No Change Necessary; PacifiCorp must report in 2022 WMP Update

2. NEXT STEPS

1. Approved Changed Orders are effective retroactive to 2021.
2. For approved Change Orders that affect a 2021 target, each utility must submit updated Q4 Quarterly Data Reports reflecting the updated targets by close of business April 25, 2022.

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