



October 7, 2022

To: 2023 to 2025 Electrical Corporation Wildfire Mitigation Plans docket (#2023-2025-WMPs)

Subject: Independent Transmission Operator Supplement to the 2023-2025 Wildfire Mitigation Plan Technical Guidelines

Dear Wildfire Mitigation Plan Stakeholders:

Pursuant to Government Code section 15475.6, the Office of Energy Infrastructure Safety (Energy Safety) releases the following draft supplement to the 2023-2025 Wildfire Mitigation Plan Technical Guidelines for public comment.

The WMP Technical Guidelines set forth the technical requirements of the Wildfire Mitigation Plan submission. The attached supplement modifies those requirements for independent transmission operators (ITOs).

Public Comment

On October 7, 2022, the Draft Independent Transmission Operator Supplement to the 2023-2025 Wildfire Mitigation Plan Technical Guidelines is hereby published for public review and comment. Comments will be accepted through November 7, 2022, 5:00 p.m. Pacific Time. Reply comments will not be considered.

Comments must be submitted to the 2023-2025 Wildfire Mitigation Plans docket (#2023-2025-WMPs)¹ and titled “[Commenter Name] Comments on the Draft Independent Transmission Operator Supplement.”

To receive notifications of the comments on these documents, subscribe to Energy Safety’s Wildfire Mitigation Plans Service List by following the instructions on [Energy Safety’s website](https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/) (<https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/>).

¹ [Submit comments to the 2023-2025-WMPs docket](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs)

(<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>, accessed September 27, 2022)

Public Workshop

Energy Safety will present the Draft 2023-2025 Wildfire Mitigation Plan Guidelines, of which the Draft Independent Transmission Operator Supplement is a component, at a public workshop on October 17, 2022. Public and Stakeholder comment and questions will be accepted verbally during the workshop. The workshop can be attended remotely. Information on how to participate in the public workshop along with an agenda are available on [Energy Safety's website](#).²

Adoption Meeting

Pursuant to Government Code section 15475.6, Energy Safety will hold a public meeting to receive public comment on the 2023-2025 Wildfire Mitigation Plan Guidelines, including all components, prior to their adoption. Energy Safety will hold this public meeting in November 2022. Energy Safety will provide the public at least 10 days' advance notice of this meeting.

Sincerely,



Melissa Semcer
Deputy Director, Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

² Information on Energy Safety's public workshop on the Draft 2023-2025 Wildfire Mitigation Plan Guidelines: <https://energysafety.ca.gov/events-and-meetings/events/draft-2023-2025-wmp-guidelines-public-workshop/> (accessed Oct. 7, 2022).



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY'S
DRAFT INDEPENDENT TRANSMISSION
OPERATOR SUPPLEMENT TO THE
2023-2025 WILDFIRE MITIGATION PLAN
TECHNICAL GUIDELINES**

October 2022

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1. INTRODUCTION

This document is the Office of Energy Infrastructure Safety’s (Energy Safety’s) independent transmission operator (ITO) supplement to the 2023-2025 Wildfire Mitigation Plan (WMP) Technical Guidelines (ITO Supplement).

1.1 Authority

Energy Safety has authority under Government Code section 15475.6 to “adopt guidelines setting forth the requirements, format, timing, and any other matters required to exercise its powers, perform its duties, and meet its responsibilities described in Sections 326, 326.1, and 326.2 and Chapter 6 (commencing with Section 8385) of Division 4.1 of the Public Utilities Code...”¹

1.2 Purpose

Pursuant to Public Utilities Code section 8386(b), electrical corporations must annually prepare and submit a WMP to Energy Safety for review and approval.² The plans must cover at least a three-year period and must satisfy requirements set forth by Energy Safety. At its discretion, Energy Safety may allow the annual submissions to be updates to the electrical corporation’s last approved comprehensive WMP (Base WMP), provided that each electrical corporation submits a Base WMP at least once every three years. The purpose of the ITO Supplement is to present the modified reporting requirements for ITOs, intended to inform the preparation and submission of their 2023–2025 Base WMPs.

Those preparing and submitting the ITO Base WMPs must read this supplement in conjunction with the 2023-2025 WMP Technical Guidelines, the WMP Process and Procedures Guidelines, the Electrical Corporation Wildfire Mitigation Maturity Survey, the WMP

¹ [Government Code section \(§\) 15475.6](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=15475.6)

(https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=15475.6, accessed Sept. 26, 2022).

² [Public Utilities \(Pub. Util.\) § 8386\(b\)](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=8386.#:~:text=(b),)

([https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=8386.#:~:text=\(b\),](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=8386.#:~:text=(b),) accessed Sept. 26, 2022).

Submission Template, and the WMP Data Guidelines to understand the full extent of substantive and procedural requirements for ITOs.

1.3 Qualification Criteria

ITOs do not have end-use customers and therefore do not have service territories.

This ITO Supplement applies to all ITOs.

1.4 Minimum Statutory Requirements

All California electrical corporations, including all ITOs, must meet the minimum statutory requirements provided in Public Utilities Code section 8386(c).³ At present, there are 22 minimum requirements.

Where a requirement under Public Utilities Code section 8386(c) does not apply to an ITO, the ITO must clearly describe in the relevant section of its WMP why it does not apply. The modified reporting requirements for ITOs described in Section 2 of this supplement do not discharge ITOs from any of their obligations pursuant to Public Utilities Code section 8386(c). Energy Safety will consider a WMP or Update lacking information for any of the requirements under Public Utilities Code section 8386(c) to be incomplete pursuant to the 2023-2025 WMP Process and Evaluation Guidelines, Section 4.1 “Completeness Check/Pre-Submission.”⁴

Outside these requirements, an ITO may submit its WMP with a different level of granularity on certain topics, as described in Table 1.

³ [Pub. Util. Code § 8386\(c\)](#)

([https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=8386.#:~:text=\(c\),](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=8386.#:~:text=(c),) accessed Sept. 26, 2022).

⁴ [2023-2025 Draft Wildfire Mitigation Plan Guidelines](#) - Attachment 2 - Draft 2023-2025 WMP Process and Evaluation Guidelines ([https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53032&shareable=true,](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53032&shareable=true) accessed Sept. 29, 2022).

2. ITO MODIFIED REPORTING REQUIREMENTS

Table 1 below presents Energy Safety’s modified reporting requirements for ITOs, intended to inform the preparation and submission of their 2023–2025 Base WMPs.

Table 1 references section numbers and descriptions from the 2023-2025 WMP Technical Guidelines.⁵ ITOs must comply with reporting requirements described in the 2023-2025 WMP Technical Guidelines for any section that is not included in Table 1.

Table 1: ITO Modified Reporting Requirements for the 2023-2025 WMP Cycle

Section/Subsection of 2023-2025 WMP Technical Guidelines	Description	Energy Safety’s Findings	Reporting Requirement Modification
5.1 Service Territory	“The electrical corporation must provide a high-level description of its service territory...”	ITOs do not have service territories.	The reporting requirements associated with Section 5.1 of the 2023-2025 WMP Technical Guidelines do not apply to ITOs.
5.3.1 Fire Ecology	“The electrical corporation must provide a brief narrative describing the fire ecology or ecologies across its service territory.”	ITOs do not have end-use customers and therefore have no service territories.	In Section 5.3.1, ITOs must provide a brief narrative describing the fire ecology or ecologies adjacent to their assets,

⁵ [2023-2025 Draft Wildfire Mitigation Plan Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53032&shareable=true) - Draft 2023-2025 WMP Technical Guidelines (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53032&shareable=true, accessed Sept. 29, 2022).

Section/Subsection of 2023-2025 WMP Technical Guidelines	Description	Energy Safety's Findings	Reporting Requirement Modification
			rather than across their service territory.
5.4.1 Urban, Rural, and Highly Rural Customers	“The electrical corporation must provide a brief narrative describing the distribution of urban, rural, and highly rural areas and customers across its service territory.”	ITOs do not have end-use customers and therefore have no service territories.	The reporting requirements associated with Section 5.4.1 of the 2023-2025 WMP Technical Guidelines do not apply to ITOs.
5.4.2 Wildland-Urban Interface (WUI)	“The electrical corporation must provide a brief narrative describing the WUIs across its service territory.”	ITOs do not have end-use customers and therefore have no service territories.	The reporting requirements associated with Section 5.4.2 of the 2023-2025 WMP Technical Guidelines do not apply to ITOs.
5.4.3 Communities at Risk	“In this section of the WMP, a utility must provide a high-level overview of individuals at risk, communities at risk, AFN customers, social vulnerability, and communities vulnerable because of single access/egress conditions within its service territory.”	ITOs do not have end-use customers.	In Section 5.4.3, ITOs must provide a high-level overview of individuals at risk, communities at risk, AFN customers, social vulnerability, and communities vulnerable because of single access/egress conditions adjacent to their assets, rather than within their service territory.

Section/Subsection of 2023-2025 WMP Technical Guidelines	Description	Energy Safety's Findings	Reporting Requirement Modification
6. Risk Methodology and Assessment	“In this section of the WMP, the electrical corporation must provide an overview of its risk methodology, key input data and assumptions, risk analysis, and risk presentation...”	ITOs have significantly less infrastructure than the large investor-owned utilities (IOUs) and small and multi-jurisdictional utilities (SMJUs) and do not have service territories.	ITOs must comply with the requirements of Public Utilities Code sections 8386(c)(8) and (12). ⁶ However, the level of detail required by Section 6 of the 2023-2025 WMP Guidelines regarding risk modeling is not required for ITOs. ITOs must instead describe their own methods to determine risk.
7. Wildfire Mitigation Strategy Development	“In this section of the WMP, the electrical corporation must provide a high-level overview of its risk evaluation and process for deciding on a portfolio of mitigation	ITOs have significantly less infrastructure than the large IOUs and SMJUs and do not	ITOs do not have to use modeling to develop their wildfire mitigation strategy. However, ITOs must describe their wildfire

⁶ (8) “Identification of circuits that have frequently been deenergized pursuant to a deenergization event to mitigate the risk of wildfire and the measures taken, or planned to be taken, by the electrical corporation to reduce the need for, and impact of, future deenergization of those circuits, including, but not limited to, the estimated annual decline in circuit deenergization and deenergization impact on customers, and replacing, hardening, or undergrounding any portion of the circuit or of upstream transmission or distribution lines”;

(12) “A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the electrical corporation’s service territory, including all relevant wildfire risk and risk mitigation information that is part of the commission’s Safety Model Assessment Proceeding (A.15-05-002, et al.) and the Risk Assessment Mitigation Phase filings.”

Section/Subsection of 2023-2025 WMP Technical Guidelines	Description	Energy Safety's Findings	Reporting Requirement Modification
	initiatives to achieve maximum feasible ⁷ risk reduction and that meet the goals and objectives stated in Sections 4.1–4.2, and wildfire mitigation strategy for 2023-2025.”	have service territories.	mitigation strategy, including the process they use to select mitigations.
8.3.5 Weather Forecasting	“The electrical corporation must describe its systems, processes, and procedures used to forecast weather within its service territory.”	ITOs have significantly less infrastructure than the large IOUs and SMJUs and do not have service territories.	ITOs’ weather forecasting systems, processes, and procedures do not have to be informed by modeling. However, ITOs must describe their approach to forecasting the weather.
8.3.6 Ignition Likelihood Calculation	“The electrical corporation must describe its process to calculate the likelihood of ignition in current and forecasted weather scenarios.”	ITOs have significantly less infrastructure than the large IOUs and SMJUs and do not have service territories.	ITOs’ ignition likelihood calculations do not have to be informed by modeling. However, ITOs must state how they determine ignition likelihood.
8.3.7 Ignition Consequence	“The electrical corporation must describe its process to calculate the consequence	ITOs have significantly less infrastructure than the large	ITOs’ ignition consequence calculations do not have to be

⁷ “Maximum feasible” means, in accordance with Public Utilities Code section 326(a)(2), capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

Section/Subsection of 2023-2025 WMP Technical Guidelines	Description	Energy Safety’s Findings	Reporting Requirement Modification
Calculation	of ignition in current and forecasted weather scenarios.”	IOUs and SMJUs and do not have service territories.	informed by modeling. However, ITOs must state how they determine ignition consequence.
8.4.6 Customer Support in Wildfire and PSPS Emergencies	“In this section of the WMP, the electrical corporation must provide an overview of its programs, systems, and protocols to support residential and non-residential customers in wildfire emergencies and PSPS events.”	ITOs do not have end-use customers.	ITOs must comply with Public Utilities Code section 8386(c)(21). ⁸ Beyond that, the reporting requirements associated with Section 8.4.6 of the 2023-2025 WMP Technical Guidelines do not apply to ITOs.
8.5.2 Public Outreach and Education Awareness Program	“The electrical corporation must provide a high-level overview of its public outreach and education awareness program(s) for wildfires; outages due to wildfires, PSPS, and protective equipment and device settings; service restoration before,	ITOs do not have end-use customers.	ITOs must comply with Public Utilities Code section 8386(c)(19)(B). ⁹ Beyond that, the reporting requirements associated with Section 8.5.2 of the 2023-2025 WMP Technical

⁸ (21) “Protocols for compliance with requirements adopted by the commission regarding activities to support customers during and after a wildfire, outage reporting, support for low-income customers, billing adjustments, deposit waivers, extended payment plans, suspension of disconnection and nonpayment fees, repair processing and timing, access to electrical corporation representatives, and emergency communications.”

⁹ (19)(B) “Plans for community outreach and public awareness before, during, and after a wildfire, including language notification in English, Spanish, and the top three primary languages used in the state other than English or Spanish, as determined by the commission based on the United States Census data.”

Section/Subsection of 2023-2025 WMP Technical Guidelines	Description	Energy Safety’s Findings	Reporting Requirement Modification
	during, and after the incidents (as required by Public Utilities Code section 8386(c)(19)(B)); and vegetation management.”		Guidelines do not apply to ITOs.
8.5.3 Engagement with Access and Functional Needs Populations	“In this section, the electrical corporation must provide an overview of its process for understanding, evaluating, designing, and implementing wildfire and PSPS risk mitigation strategies, policies, and procedures specific to [access and functional needs] customers across its territory.”	ITOs do not have end-use customers.	ITOs must comply with Public Utilities Code section 8386(c)(19)(B). Beyond that, the reporting requirements associated with Section 8.5.3 of the 2023-2025 WMP Technical Guidelines do not apply to ITOs.
9.1.1 Key PSPS Statistics	“In this section, the electrical corporation must include a summary table of PSPS event data.”	ITOs do not have end-use customers.	ITOs must comply with Public Utilities Code section 8386(c)(8). ¹⁰ Beyond that, the reporting requirements associated with Section 9.1.1 of the 2023-2025 WMP Technical Guidelines do not

¹⁰ (8) “Identification of circuits that have frequently been deenergized pursuant to a deenergization event to mitigate the risk of wildfire and the measures taken, or planned to be taken, by the electrical corporation to reduce the need for, and impact of, future deenergization of those circuits, including, but not limited to, the estimated annual decline in circuit deenergization and deenergization impact on customers, and replacing, hardening, or undergrounding any portion of the circuit or of upstream transmission or distribution lines.”

Section/Subsection of 2023-2025 WMP Technical Guidelines	Description	Energy Safety’s Findings	Reporting Requirement Modification
			apply to ITOs.
9.1.3 Objectives	“Each electrical corporation must summarize the objectives for its 3-year and 10-year plans to reduce the scale, scope, and frequency of PSPS events.”	ITOs do not have end-use customers.	The ITOs must comply with Public Utilities Code section 8386(c)(8). Beyond that, the reporting requirements associated with Section 9.1.3 of the 2023-2025 WMP Technical Guidelines do not apply to ITOs.
9.1.4 Targets	“The electrical corporation must list all targets it uses to track progress on reducing the scope, scale, and frequency of PSPS for the next three years (2023–2025).”	ITOs do not have end-use customers.	ITOs must comply with Public Utilities Code section 8386(c)(8). Beyond that, the reporting requirements associated with Section 9.1.4 of the 2023-2025 WMP Technical Guidelines do not apply to ITOs.
9.1.5 Performance Metrics	<p>“Each electrical corporation must list and describe all outcome metrics and leading indicators it uses to evaluate:</p> <ul style="list-style-type: none"> • The effectiveness of reducing reliance on PSPS • The electrical corporation’s performance on those metrics since 2020 (if previously 	ITOs do not have end-use customers.	ITOs must comply with Public Utilities Code section 8386(c)(8). Beyond that, the reporting requirements associated with Section 9.1.5 of the 2023-2025 WMP Technical Guidelines do not apply to ITOs.

Section/Subsection of 2023-2025 WMP Technical Guidelines	Description	Energy Safety’s Findings	Reporting Requirement Modification
	collected) • Projected performance on metrics for 2023-2025 • How the metrics can be verified”		
9.5 Planning and Allocation of Resources for Service Restoration due to PSPS	“[I]n this section, the electrical corporation is [...] required to provide a cross-reference to Section 8.4.5.2 [Planning and Allocation of Resources] and any other section of the WMP providing details of resource planning for PSPS.”	ITOs do not have end-use customers.	ITOs must comply with Public Utilities Code section 8386(c)(16). ¹¹ Beyond that, the reporting requirements associated with Section 9.5 of the 2023-2025 WMP Technical Guidelines do not apply to ITOs.

¹¹ (16) “A showing that the electrical corporation has an adequately sized and trained workforce to promptly restore service after a major event, taking into account employees of other utilities pursuant to mutual aid agreements and employees of entities that have entered into contracts with the electrical corporation.”

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