



OFFICE OF ENERGY INFRASTRUCTURE SAFETY'S REVISED 2022 CHANGE ORDER GUIDELINES FOR ELECTRICAL CORPORATIONS

November 2022

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Executive Summary

The following guidelines outline the process for an electrical corporation to request Energy Safety's approval of significant changes related to its 2022 Wildfire Mitigation Plan Update mitigation initiatives.

Electrical corporations are required to request approval of changes to their mitigation initiatives if the changes substantially alter the course of their mitigation plan or potentially reduce asset or community protections from wildfire or Public Safety Power Shutoff (PSPS) risk. Specific criteria for change order requests are described in Section 2.

1. The Purpose of a Change Order

After approval of an electrical corporation's Wildfire Mitigation Plan (WMP) or Wildfire Mitigation Plan Update (Update), the electrical corporation may seek to change approved mitigations as it gains experience and measures its mitigation measure outcomes. To make this type of alteration to its WMP or Update based on an updated understanding of risk, an electrical corporation must submit a change order request.

Energy Safety evaluates change order requests to ensure that electrical corporations continue to follow a risk-based approach to mitigation of wildfire and PSPS risk. Energy Safety will issue a decision on each change order request as set forth in Section 4.

2. Criteria for a Change Order Request

An electrical corporation must request approval from Energy Safety if it is making any significant change to a mitigation initiative described in its 2022 Update as soon as practicable after the Update is approved and the electrical corporation determines a change is warranted. To be considered "significant" the change must meet the criteria set out in both A and B below.

A. Type of Initiative

The proposed change is to a mitigation initiative in one or more of the following categories:

- Risk assessment and mapping
- Vegetation management and inspections
- Grid design and system hardening
- Grid operations
- Asset management and inspections
- Public Safety Power Shutoff (PSPS)

B. Change in Risk

The change results in any of the following:

- An increase or decrease of more than 25% of an initiative's risk reduction value based on an updated understanding of risk
- The change represents a significant shift in either the strategic direction or purpose of an initiative (e.g., introducing a novel risk model that significantly alters the risk profile of the electrical corporation's circuits)

If an electrical corporation is unsure whether a proposed change meets these criteria, it is encouraged to submit an advance inquiry to Energy Safety on the matter via email at safetypolicy@energysafety.ca.gov.

Electrical corporations should not request approval for a change in approach or targets because full implementation may not be feasible. Similarly, electrical corporations should not request modification of an approach or target because the electrical corporation expects to exceed its targets. Energy Safety will evaluate an electrical corporation's failure to meet a target (or its overshoot of a target) from the approved WMP or Update as part of Energy Safety's compliance program. Electrical corporations should include details about their progress against their targets in their Quarterly Initiative Updates.¹

Electrical corporations should also not request approval for a fundamental change in strategy, as such a change may be too substantive for the change order process.

¹ Quarterly Initiative Update dockets are filed according to year (e.g., "2022-QIU") here: <https://efiling.energysafety.ca.gov/Dockets.aspx?caseId=1252> (accessed Aug. 8, 2022).

3. Submission of Change Order Requests & Stakeholder Comments

Electrical corporations should endeavor to submit change order requests as soon as practicable after the electrical corporation determines a change is warranted. Multiple submissions are permissible. However, electrical corporations must submit change order requests related to their 2022 Updates by 5:00 p.m. on November 1, 2022, or within 10 days of Energy Safety’s approval of their 2022 Update, if the approval is issued after November 1, 2022.²

Change order requests must be submitted to Energy Safety’s e-filing system in the 2022 Wildfire Mitigation Plans docket (#2022-WMPs).³ Electrical corporations must concurrently send all change order requests to the Department of Forestry and Fire Protection at CALFIREUtilityFireMitigationUnit@fire.ca.gov. Change order requests should be titled “name of electrical corporation_the number of the change order request_the date the change order request is submitted,” for example, “PGE_change order request01_06302022.”

3.1 Requirements for Change Order Requests

Requests for changes that meet the criteria described in Section 2 must include the following:

- A. A brief description of the proposed change including:
 - 1. The title of the initiative for which the proposed change request is being submitted
 - 2. The page number(s) in the 2022 Update where that initiative is described
 - 3. Whether the proposed change is a change to an approach, a target, or both
- B. The planned expenditure for that initiative according to the 2022 Update including:
 - 1. The percent of planned expenditure already spent
 - 2. The planned expenditure for the remainder of the current WMP cycle (prior to the 2023 WMP)

² For documents submitted after 5:00 p.m. on a business day or any time on a Saturday, Sunday, or holiday, Energy Safety will consider the date of submission to be the next business day.

³ Submit change order requests to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs> (accessed June 21, 2022).

3. If the expenditure amount is being redeployed, the amount being redeployed
 - i. From what budget
 - ii. To what budget
- C. The type of change proposed; changes may include: increase in scale, decrease in scale, change in prioritization, change in timing, or change in the nature of the work.
- D. Description of the expected outcome from the change within the current WMP cycle, including any reduction to:
 1. Wildfire risk (including ignition and consequence risk)
 2. PSPS risk

3.2 Stakeholder Comments

Stakeholders may comment on change order requests within 20 days of the date the electrical corporation submits a change order request to Energy Safety's 2022-WMPs docket.^{4,5} The three-day deadline for discovery during the WMP or Update review period also applies during stakeholder review of change order requests.

Stakeholder comments must be submitted to Energy Safety's 2022-WMPs docket.⁶ Stakeholder comments should be titled "<Commenter name> Comments on < file name of the change order request>."

⁴ Dates falling on a Saturday, Sunday or holiday as defined in Government Code Section 6700 have been adjusted to the next business day in accordance with Government Code Section 6707.

⁵ Submit comments to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs> (accessed June 21, 2022).

⁶ Submit comments to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs> (accessed June 21, 2022).

4. Change Order Evaluation

Energy Safety will evaluate change order requests and approve or deny the request based on the criteria in Table 1 below. Electrical corporations are encouraged to contact Energy Safety as set forth in Section 2 to receive technical assistance regarding change order requests.

Table 1

Decision	Rationale	Impact
Approved	Proposed change responds to updated understanding of risk and is likely to reduce wildfire or PSPS risk.	Electrical corporation must reflect change in all subsequent reports or WMP/Update submissions to Energy Safety.
Rejected	<p>Proposed change is not likely to reduce wildfire or PSPS risk over existing approved initiative;</p> <p>OR</p> <p>Proposed change does not respond to updated risk assessment and/or only responds to underperformance or overperformance for reasons unrelated to the risk assessment;</p> <p>OR</p> <p>Proposed change is too substantive for the change order process.</p>	Targets/approaches remain the same as proposed in the approved WMP/Update.

Electrical corporations must not include updated targets or approaches in any filing to Energy Safety, including Quarterly Data Reports, until the change is approved. Upon approval, the electrical corporation may amend any previous filings via submission of an amended filing to the relevant service list.

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