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Caroline Thomas Jacobs, Director

Date: March 3, 2023

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

Subject: Substantive Revision to 2023 Maturity Survey for Public Comment

On December 7, 2022, the Office of Energy Infrastructure Safety (Energy Safety) published the 2023 Electrical Corporation Wildfire Mitigation Maturity Survey (Maturity Survey). On January 6, 2023, Energy Safety published a revised Maturity Survey correcting non-substantive errors. Energy Safety published a second revised Maturity Survey on February 21, 2023, correcting non-substantive errors.

Energy Safety proposes removing eighteen questions from the Maturity Survey to more accurately assess each electrical corporation's maturity in wildfire mitigation. Questions removed from the Maturity Survey will not be used in Energy Safety's evaluation of electrical corporations' Wildfire Mitigation Plans (WMPs). The questions Energy Safety proposes removing from the Maturity Survey are listed in Appendix A. Removing these Maturity Survey questions constitutes a substantive change to the Maturity Survey and the revision is hereby published for public review and comment.

Comments will be accepted through April 3, 2023, 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).⁴

Sincerely,

Melissa Semcer

Deputy Director, Electric Safety Policy Division

Office of Energy Infrastructure Safety

¹ 2023 Wildfire Mitigation Plan Maturity Survey,

https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53288&shareable=true (accessed February 27, 2023)

² Revised Final Maturity Model and Maturity Survey,

https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53336&shareable=true (accessed February 27, 2023)

³ Second Revised Final Maturity Survey,

https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53395&shareable=true (accessed February 27, 2023)

⁴ https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs

Appendix A – Questions Energy Safety Proposes Removing from the Maturity Survey

HFTD?
Are vegetation inspections for the entire grid conducted at least once annually?
Are vegetation inspections for the entire grid conducted at least once every six months?
Are vegetation inspections for the entire grid conducted at least every three months?
Does the electrical corporation automatically communicate the location and extent of the wildfire perimeter to members of the public and public safety partners?
Does the electrical corporation provide public notification of wildfire incident immediately when there is an imminent threat to life, health, or property to the public?
Does the electrical corporation provide the location and extent of wildfire perimeter?
Does the electrical corporation provide the public information on the ability of carriers to redistribute communications during wildfires and PSPS?
Does the electrical corporation provide the public information on cross- jurisdictional needs during wildfires and PSPS?
Does the electrical corporation provide the public information on loss of internet connectivity during wildfires and PSPS?
Does the electrical corporation provide the public information on loss of cell towers or overloaded cell systems during wildfires and PSPS?
Does the electrical corporation provide the public information on overloaded networks during wildfires and PSPS?
Has the electrical corporation adopted Integrated Public Warning Systems (IPAWS)?

6.3.4.Q28	Does the electrical corporation provide high-frequency radio alerts?
6.5.1.Q3	Does the electrical corporation provide billing adjustments to residential and non-residential customers within four hours of wildfire and PSPS incidents?
6.5.1.Q4	Does the electrical corporation provide deposit waivers to residential and non-residential customers within four hours of wildfire and PSPS incidents?
6.5.1.Q5	Does the electrical corporation provide extended payment plans to residential and non-residential customers within four hours of wildfire and PSPS incidents?
6.5.1.Q6	Does the electrical corporation provide suspension of disconnection and nonpayment fees to residential and non-residential customers within four hours of wildfire and PSPS incidents?