



Date: April 19, 2023

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

Subject: Proposed Final Revisions to 2023 Maturity Survey

Enclosed in Appendix A are the proposed final revisions to the 2023 Electrical Corporation Wildfire Mitigation Maturity Survey (Maturity Survey) that the Office of Energy Infrastructure Safety (Energy Safety) will consider for adoption on April 24, 2023.

On March 3, 2023, Energy Safety issued a letter proposing the removal of eighteen questions from the Maturity Survey.¹ Energy Safety solicited public comment on the proposal and received comments from Pacific Gas and Electric Company (PG&E),² Southern California Edison Company (SCE),³ and San Diego Gas & Electric Company (SDG&E)⁴ on April 3, 2023. Energy Safety has evaluated the comments and agrees with some concerns raised by PG&E and SCE about Maturity Survey questions that ask for the maturity level of a different maturity capability.⁵ These questions unduly weigh some capabilities over others; therefore, Energy Safety proposes removing five additional questions from the Maturity Survey.

Energy Safety proposes to remove from the Maturity Survey the previously proposed eighteen questions and the additional five questions identified above; in total this amounts to the removal of twenty-three Maturity Survey questions. Removed questions will not be used in Energy Safety's evaluation of electrical corporations' 2023-2025 Wildfire Mitigation Plans. Appendix A lists the twenty-three questions that Energy Safety proposes removing from the Maturity Survey. The five questions newly added to the list are shown in redline.

¹ Substantive Revisions to Maturity Survey for Public Comment, <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53417&shareable=true> (accessed April 17, 2023).

² PG&E Comments on Substantive Revisions to Maturity Survey, <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53598&shareable=true> (accessed April 17, 2023).

³ SCE Comments on Substantive Revisions to Maturity Survey, <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53599&shareable=true> (accessed April 17, 2023).

⁴ SDG&E Comments on Substantive Revisions to Maturity Survey, <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53600&shareable=true> (accessed April 17, 2023).

⁵ PG&E comments at p. 3; SCE comments at p. 61.

Energy Safety previously announced the adoption meeting for the Revised 2023 Maturity Survey.⁶ At the April 24, 2023, adoption meeting, Energy Safety will present a brief overview, take public comments, and consider adoption of the Revised 2023 Maturity Survey.

Sincerely,

A handwritten signature in black ink, appearing to read "Melissa Semcer". The signature is fluid and cursive, with the first name "Melissa" written in a larger, more prominent script than the last name "Semcer".

Melissa Semcer
Deputy Director, Electric Safety Policy Division
Office of Energy Infrastructure Safety

⁶ Revised 2023 Maturity Survey Adoption Meeting Announcement,
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53633&shareable=true> (accessed April 17, 2023)

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

- 1.4.2.Q10 Model inputs and outputs meet, at a minimum, what maturity level for each of the following capabilities? 1. Statistical Weather, Climate, and Fire Modeling 2. Estimation of Wildfire and PSPS Risk Exposure 3. Estimation of Community Vulnerability to Wildfire and PSPS 4. Ignition Likelihood Estimation 5. Weather Forecasting Ability 6. Wildfire Forecasting Ability
- 1.4.6.Q1 Spatial granularity requirements for model inputs, outputs, calculation steps, and validation basis meet, at a minimum, what maturity level for each of the following capabilities? 1. Statistical Weather, Climate, and Fire Modeling 2. Estimation of Wildfire and PSPS Risk Exposure 3. Estimation of Community Vulnerability to Wildfire and PSPS 4. Ignition Likelihood Estimation 5. Weather Forecasting Ability 6. Wildfire Forecasting Ability
- 2.3.1.Q13 Weather forecasting automation requirements meet those of what maturity level for capability 8?
- 2.3.2.Q14 The electrical corporation wildfire spread model inputs include the weather forecasting requirements of what maturity level of capability 8?
- 2.3.6.Q1 The horizontal resolution of weather forecasting requirements meets the requirements for what maturity level in capability 8?
- 3.4.3.Q2 Do the grid design, design evaluation, and grid impact evaluation consider the total percentage of grid localization features normalized by circuit length in the HFTD?
- 4.2.1.Q1 Are vegetation inspections for the entire grid conducted at least once annually?
- 4.2.1.Q3 Are vegetation inspections for the entire grid conducted at least once every six months?
- 4.2.1.Q6 Are vegetation inspections for the entire grid conducted at least every three months?
- 6.3.1.Q2 Does the electrical corporation automatically communicate the location and extent of the wildfire perimeter to members of the public and public safety partners?
- 6.3.4.Q10 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?

- 6.3.4.Q11 Does the electrical corporation provide the location and extent of wildfire perimeter?
- 6.3.4.Q13 Does the electrical corporation provide the public information on the ability of carriers to redistribute communications during wildfires and PSPS?
- 6.3.4.Q15 Does the electrical corporation provide the public information on cross-jurisdictional needs during wildfires and PSPS?
- 6.3.4.Q17 Does the electrical corporation provide the public information on loss of internet connectivity during wildfires and PSPS?
- 6.3.4.Q18 Does the electrical corporation provide the public information on loss of cell towers or overloaded cell systems during wildfires and PSPS?
- 6.3.4.Q21 Does the electrical corporation provide the public information on overloaded networks during wildfires and PSPS?
- 6.3.4.Q23 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?