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VIA ELECTRONIC SUBMISSION

Caroline Thomas Jacobs
Director, Office of Energy Infrastructure
Safety 715 P Street, 20th Floor
Sacramento, CA 95814

**RE: Submission of LS Power Grid California's Final 2023-2025 Wildfire
Mitigation Plan**

Docket # 2023-2025-WMPs

Dear Director Thomas Jacobs:

In accord with The Office of Energy Infrastructure Safety's Determination of Completeness for LS Power's 2023–2025 Wildfire Mitigation Plan Pre-Submission, as received March 27th 2023, and Energy Safety's 2023–2025 WMP Wildfire Mitigation Plan Process and Evaluation Guidelines, LS Power Grid California (LSPGC) is submitting its final 2023–2025 Wildfire Mitigation Plan (WMP).

As directed by Energy Safety, LSPGC has revised its WMP pre-submission to satisfy the completeness check by including the completed information identified below. LSPGC's efforts to address the areas identified as incomplete as well as the correction of non-substantive errors identified by Energy Safety are described in Section I below. LSPGC notes that in some instances, minor typographical errors (*e.g.*, misspellings, numbering, punctuation errors) in addition to non-substantive errors identified by Energy Safety have been corrected that LSPGC does not consider a correction or change to its WMP and may not necessarily be reflected in Section I.

I. Incomplete Information Identified by Energy Safety in LSPGC’s 2023–2025 WMP Pre-Submission

| Section of LS Power’s WMP Pre-Submission | WMP Pre-Submission PDF Page Number | Information to Make Complete | LSPGC Response |
|--|------------------------------------|---|---|
| 3 Statutory Requirements Checklist, List is hyperlinked | 17 | LS Power’s Statutory Requirements Checklist is not hyperlinked. LS Power must add hyperlinks to its Statutory Requirements Checklist. | WMP Section/Page column updated with latest page numbers and hyperlinks to the listed locations in the document. |
| 8.1.1.2 Targets, Table: Grid Design, Operations, and Maintenance Targets | 114 | LS Power did not include initiative activities. LS Power states that it will update Table 8-3 in future Wildfire Mitigation Plan (WMP) documents as relevant but does not provide clarification on when that may be. LS Power must provide a timeline for its plans to populate Table 8-3, as well as an explanation for why it is currently empty. | Added Clarification to Section 8.1.1.2 and updated table 8-3 to include one long-term objective. |
| 8.1.2 Grid Design and System Hardening, 8.1.2.6 Emerging Grid Hardening Technology Installations and Pilots | 115 | For Section 8.1.2.6, LS Power states that it "is utilizing proven design concepts and methods with its first two substation installations." Please elaborate on what these concepts and methods consist of and how this relates to emerging grid hardening technology. | Elaborated on facility design concepts and how they relate to hardening of facilities in section 8.1.2.6. |
| 8.3.1.2 Targets, Table: Situational Awareness Initiative Targets | 144 | LS Power must include its LSP-07 initiative (integration of Storm-Geo for weather forecasting) in its Table 8-22. | Added initiative LSP-05 to Table 8-22 (table number updated to 8-23 per later comment and LSP-7 number updated to LSP-05) |

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| 8.4.5.2 Planning and Allocation of Resources | 180–181 | <p>To assure public safety during service restoration, LS Power must provide a narrative in this section on how it:</p> <ul style="list-style-type: none"> • Uses weather reports to pre-position manpower and equipment before anticipated severe weather that could result in an outage • Sets priorities • Facilitates internal and external communications • Restores service | Added clarification for each point listed in the previous cell. |
| 8.5.4 Collaboration on Local Wildfire Mitigation Planning, List of entities within service territory for collaboration (table) | 189 | <p>LS Power states that it is at the very beginning stages of contact and collaboration with local agencies and as such, has no history of collaboration to report in Table 8-61; however, the 2023–2025 WMP Technical Guidelines require electrical corporations to list agencies with which they have collaborated or intend to collaborate. LS Power must list any agencies or organizations it intends to collaborate with in Table 8-61 or provide an explanation if no agencies have been identified for possible collaboration at this time.</p> | Added Shasta County Fire Safe Council as an organization in which LSPGC plans to collaborate with in the future to table 8-61. |
| Appendix B: Supporting Documentation for Risk Methodology and Assessment, Summary Documentation: High-level calculation procedure schematic | B | <p>LS Power does not provide a schematic equivalent to Figure B-2 as required by the 2023–2025 WMP Technical Guidelines. LS Power must provide such figure demonstrating its risk modeling flow.</p> | Figure has been added to Appendix B on page 2 and labeled as Figure B-1. Additional Figure in Appendix B has been renumbered as Figure B-2. |

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|--|------------------------------------|---|---|
| Table Numbering | Overall | Energy Safety identified error: "The tables in the LS Power's WMP pre-submission are not consistent with the numbering in the WMP Guidelines. LS Power is welcome to add its own tables to explain its WMP initiatives, but if it does so, it should use a separate numbering system for them so that the table numbers from the WMP Guidelines are maintained in order to facilitate the review process. | Updated the table numbering to match the WMP guidelines. |
| 8.4.5.3 Drills, Simulations, and Tabletop Exercises | 181-183 | Energy Safety identified error: "SOTP" needs to be added to the Acronyms Table. | SOTP - System Operator Training Program added to the acronym list on page 13. |
| 8.4.5.1 | 166 | LSPGC identified error: Incorrect reference | Updated reference to "Emergency Response Plan" to "Emergency Operations Plan" |

Conclusion

LSPGC appreciates Energy Safety's review and feedback on its 2023–2025 WMP Pre-Submission. The WMP as submitted to Energy Safety can be found online at <https://www.lspgridcalifornia.com/documents/>.

Respectfully submitted,

Director, Asset Management
 LS Power