



To: Compliance Enforcement Service List
From: Office of Energy Infrastructure Safety
Date: June 20, 2023
Subject: Draft Compliance Guidelines and Public Comment Period

The Office of Energy Infrastructure Safety (Energy Safety) has released the Draft Compliance Guidelines for public review and comment. The Compliance Guidelines provide definitions and establish standards the electrical corporations must follow in the implementation of their WMPs. The deadlines for public comments are as follows:

Opening Comment Deadline:

Thursday, July 10, 5 p.m. Pacific Time - 20 days from publication

Reply Comment Deadline:

Monday, July 20, 5 p.m. Pacific Time - 10 days from the opening comment deadline

Opening comments and reply comments must be submitted to the Compliance Guidelines docket via Energy Safety's e-filing system [here](#).¹

Opening comments should be titled "[*Commenter Name*] – Draft 2023 Compliance Guidelines Comments" and reply comments should be titled "[*Commenter Name*] – Draft 2023 Compliance Guidelines Reply Comments."

To receive notifications about these Compliance Guidelines and other related documents, subscribe to Energy Safety's Safety Certifications service list by following the instructions [here](#).²

The Compliance Guidelines will be considered for adoption at a virtual public meeting, at which there will be an opportunity for public comment. Further information on the date and details of that public meeting will be forthcoming.

¹ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=Compliance%20Guidelines> (accessed June 20, 2023).

² <https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/> (accessed June 20, 2023).

Availability of Documents

Documents for this meeting will be available on [Energy Safety's e-filing system](#)³ on the [Compliance Guidelines docket](#).⁴ This public meeting announcement and instructions on how to join the meeting will also be posted on [Energy Safety's Upcoming Meetings web page](#).⁵

Sincerely,

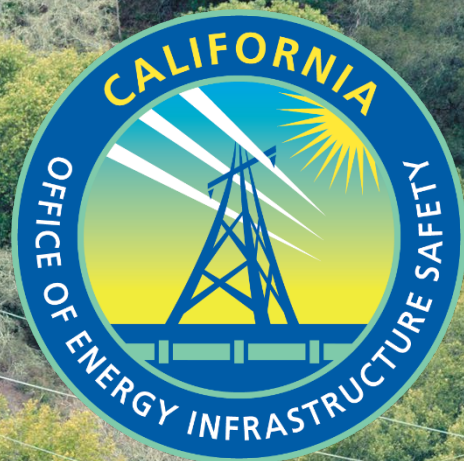


Melissa Semcer
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

³ <https://efiling.energysafety.ca.gov/> (accessed June 16, 2023).

⁴ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=Compliance%20Guidelines> (accessed June 20, 2023).

⁵ <https://energysafety.ca.gov/events-and-meetings/upcoming-events/> (accessed June 16, 2023).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY COMPLIANCE GUIDELINES

DRAFT

JUNE 2023

TABLE OF CONTENTS

- 1.0 Executive Summary 3**
 - 1.1 Authority 3
 - 1.2 Purpose and Scope 3
- 2.0 Definitions 3**
- 3.0 Notices of Violation or Defect 5**
 - 3.1 Notice..... 5
 - 3.2 Informal Conference 6
 - 3.3 Response 6
- 4.0 Electrical Corporation Annual Report on Compliance..... 7**
- 5.0 Independent Evaluator annual report on compliance..... 11**
- 6.0 Audits..... 14**
 - 6.1 Substantial Vegetation Management Audit 14
 - 6.2 Other Audits..... 15
- 7.0 Energy Safety ARC..... 15**
 - 7.1 Elements of Analysis 15
 - 7.1 Evaluation Criteria..... 16
- 8.0 File Submission & Naming Convention 17**
- 9.0 Accessibilty 19**

1.0 EXECUTIVE SUMMARY

This document sets forth the Office of Energy Infrastructure Safety's Compliance Guidelines.

1.1 Authority

The Office of Energy Infrastructure Safety (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....”

1.2 Purpose and Scope

Pursuant to Public Utilities Code section 8386(b), electrical corporations must annually prepare and submit a Wildfire Mitigation Plan (WMP) to Energy Safety for review and approval. Subsequently, pursuant to section 8386.3(c), Energy Safety is charged with overseeing the electrical corporations' compliance with the WMP. Energy Safety's Compliance Guidelines set forth substantive and procedural requirements for electrical corporations both during and after the annual compliance period.

2.0 DEFINITIONS

“Budget” – The amount of money the electrical corporation estimated, in its WMP or in its change orders, that it would spend on an initiative.

“Change Order” – An electrical corporation's request for Energy Safety approval to change or update mitigation initiatives from its approved WMP prior to submission of a subsequent WMP or Update based on an updated understanding of risk.

“Commitment” – Within the WMP, an action that the electrical corporation states it will or plans to accomplish within the compliance period. The commitment may be quantitative or qualitative in nature.

“Compliance period” – January 1 to December 31 of the plan year in the three-year WMP cycle.

“Defect” – Deficiencies, errors, or conditions that increase the risk of ignition posed by electrical lines and equipment requiring correction.

“Expenditure” – The amount of money spent by the electrical corporation on a WMP initiative within the compliance period.

“Initiative” – Measure or activity proposed or in process designed to reduce the consequences and/or probability of wildfire or PSPS.

“Notice” – A formal notification to an electrical corporation in which Energy Safety identifies and communicates the existence of one or more violations or defects.

“Objective” – Specific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program.

“Target” – A forward-looking, quantifiable measurement of work to which an electrical corporation commits to in its WMP.

“Violation” – Noncompliance with an electrical corporation’s approved WMP or any law, regulation, or guideline within Energy Safety’s authority.

3.0 NOTICES OF VIOLATION OR DEFECT

The requirements, standards, and protocols stated in this section apply to all notices issued after the effective date of these Guidelines.

3.1 Notice

Energy Safety may determine that a regulated entity is not in compliance with any matter under the authority of the office.¹ Energy Safety may issue a notice of violation (NOV) when it identifies instances of noncompliance with the WMP or any law, regulation, or guideline within the authority of the Office or a notice of defect (NOD) when it identifies deficiencies, errors, or conditions that increase the risk of ignition posed by electrical lines and equipment.² Within the NOV or NOD, Energy Safety may direct the electrical corporation to correct any defect or noncompliance.³ The corrective action directed by Energy Safety may consist of a requirement to inspect or assess, or immediately repair subject electrical corporation lines and equipment or records, and report the results of such inspection, assessment or repair, including resultant planned or completed corrective actions.

Energy Safety may prescribe a timeframe for resolution of a violation or defect. If Energy Safety assigns a risk category to a violation or defect, then Energy Safety directs electrical corporations to correct the violations and defects discovered under the following timelines below:⁴

Table 1: Energy Safety Violation and Defect Correction Timeline by Risk Category

Risk Category	Violation and defect correction timeline
Severe	<ul style="list-style-type: none"> • Immediate resolution
Moderate	<ul style="list-style-type: none"> • 2 months (in HFTD Tier 3) • 6 months (in HFTD Tier 2)

¹ Gov. Code § 15475.1.

² Gov. Code § 15475.2; Gov. Code § 15475.4; Cal. Code Regs., tit. 14, § 29302.

³ Gov. Code § 15475.2.

⁴ Cite compliance process SPD-7

Risk Category	Violation and defect correction timeline
	<ul style="list-style-type: none"> 6 months (if relevant to worker safety and not in HFTD Tiers 2 or 3)
Minor	<ul style="list-style-type: none"> 12 months or resolution scheduled in WMP update

3.2 Informal Conference

Electrical corporations may request an informal conference with Energy Safety's Compliance Assurance Division for the purpose of disputing any issues raised in an NOV or NOD no later than five (5) business days before the response deadline identified in (a) above. When scheduling such a conference, an electrical corporation must clearly identify the following:

- (1) The NOV or NOD number.
- (2) Which violation(s) or defect(s) within the NOV or NOD identified in (1) are to be discussed.
- (3) The factual, substantive basis for the conference.
- (4) Materials the electrical corporation plans to present or cover in the conference, including copies of such materials.
- (5) Electrical corporation personnel expected to attend the conference, including their titles or roles within the organization.
- (6) The requested duration of the conference.
- (7) Dates and times the electrical corporation is available to hold the conference.

Requests for informal conferences with Energy Safety must be received via e-mail to Compliance@energysafety.ca.gov, with a copy to all Energy Safety's Compliance Assurance Division identified in the subject NOV or NOD. Electrical corporations are encouraged to schedule a conference at the earliest possible time to assure an expeditious resolution of any issues. An informal conference does not extend the response deadline.

3.3 Response

Upon receipt of an NOV or NOD the electrical corporation must:

- (a) Within 30 calendar days, for each violation or defect identified, provide a written response to Energy Safety that states either:

- (1) The electrical corporation corrected or plans to correct the violation or defect, including a description of all corrective actions taken or planned and the timeline for completing those actions, or
- (2) The electrical corporation will not correct the violation or defect and the electrical corporation's reasoning or justification for inaction, including all supporting documentation.

(b) If the electrical corporation either has corrected or plans to correct the violation or defect, then within 30 calendar days⁵ after correcting the violation or defect, the electrical corporation must send Energy Safety documentation that provides sufficient assurance of the correction. If the electrical corporation corrected the violation or defect before Energy Safety served the NOV or NOD, then the electrical corporation must provide documentation of the correction within 30 days after receiving the NOV or NOD. Examples of documentation that may provide assurance of corrective action being completed include, but are not limited to:

- (1) Before and after photographs demonstrating that the violation or defect has been corrected.
- (2) A corrected version of the subject dataset, record, or documentation identified as being erroneous or deficient.
- (3) Work orders or other records documenting the action taken, the date that action was taken, and the persons responsible for taking such action to correct the violation or defect.

All files submitted by electrical corporations in accordance with (a) and (b) above must be named and submitted as required in Section 8 below.

4.0 ELECTRICAL CORPORATION ANNUAL REPORT ON COMPLIANCE

⁵ Any deadline that falls on a Saturday, Sunday, or holiday as defined in Government Code section 6700 shall be moved to the following business day.

The requirements, standards, and protocols outlined in this section are applicable to the 2023 WMP plan year and subsequent WMPs.

The Electrical Corporation Annual Report on Compliance (EC ARC) must be submitted to Energy Safety via e-filing three months after the end of the compliance period.⁶ Accordingly, the EC ARC is annually due on the State business day following March 31.⁷ See Section 8 below for instructions on the file submission and naming convention. The EC ARC is an electrical corporation's annual self-assessment of its compliance with the approved WMP during the recently completed compliance period. The EC ARC must include:

1. A written narrative including:
 - a. A clear description of the electrical corporation's progress towards achieving the objectives for the three-year WMP plan cycle, as identified in its most recently approved WMP.⁸ Progress must be discussed individually for each stated objective.
 - b. A clear description of the electrical corporation's progress towards achieving the three-year objectives⁹ listed in the tables in Section 8, including all subsections, of the WMP with completion dates¹⁰ within the recently completed compliance period. Each objective must be discussed individually and, at a minimum, include the following:
 - i. A listing of the initiative(s) and associated tracking identification numbers the electrical corporation is implementing to achieve the objective.
 - ii. Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective are documented and substantiated.
 - iii. The completion date listed in the approved WMP.
 - iv. A summary of the electrical corporation's progress made during the most recently completed compliance period.

⁶ Pub. Util. Code, § 8386.3

⁷ March 31 is a State holiday. EC ARC submissions are due on the subsequent State business day.

⁸ See Section 4.2 of the 2023-2025 WMP Technical Guidelines available at:

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>.

⁹ See section 8 of the 2023-2025 WMP Technical Guidelines, as further defined in tables for each subsection (i.e., 8.1, 8.2, etc.) in the column titled "Objectives for Three Years" (see exemplar Table 8-1 on page 77 of 2023-2025 WMP Technical Guidelines).

¹⁰ The date listed in the "Completion Date" column in the associated tables in Section 8 of the WMP.

- c. A detailed assessment of the electrical corporation's completion of the three-year objectives⁹ listed in the tables in Section 8, including all subsections, of the WMP with completion dates¹¹ within the most recently completed compliance period. Each stated objective must be discussed individually and, at a minimum, include the following information:
- i. A listing of the initiatives and associated tracking identification numbers the electrical corporation is implementing to achieve the objective.
 - ii. Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective are documented and substantiated.
 - iii. The completion date listed in the approved WMP.
 - iv. The date the electrical corporation actually completed the objective.
 - v. An explanation of how the electrical corporation utilized the identified "Method of Verification"¹² to assess the completion of the objective.
 - vi. A summary of the electrical corporation's assessment of progress towards completing the objective following use of the verification method identified in iv above, including a listing of all evidence relied upon in the electrical corporation's assessment.
 - vii. For each objective that the electrical corporation failed to complete, a detailed explanation of what was incomplete, the reason the initiative was not completed, and associated corrective actions the electrical corporation has taken to prevent recurrence of such failures.
 1. If the electrical corporation did not take corrective action to prevent recurrence of such failures, it must explain its justification for such inaction.
- d. An assessment of the electrical corporation's completion of all targets¹³ identified for each initiative listed in the tables in Section 8, including all subsections, of the WMP with target completion dates within the most recently

¹¹ The date listed in the "Completion Date" column in the associated tables in Section 8 of the WMP.

¹² The value listed in the "Method of Verification" column in the associated tables in Section 8 of the WMP. See 2023-2025 WMP Technical Guidelines, pages 75-77.

¹³ See section 8 of the 2023-2025 WMP Technical Guidelines, as further defined in tables for each subsection (i.e., 8.1, 8.2, etc.) in columns containing the terms "Target" and "Unit" (see exemplar Tables 8-3 and 8-4 on page 79 of 2023-2025 WMP Technical Guidelines).

completed compliance period.¹⁴ The assessment of each target must be discussed individually and, at a minimum, include the following information:

- i. A complete listing of all applicable targets.
- ii. The target value and associated target units.
- iii. The target completion date (i.e., year-end, Q2, Q3, etc.) listed in the WMP.
- iv. The date the electrical corporation actually completed the target.
- v. An explanation of how the electrical corporation utilized the identified “Method of Verification”¹⁵ to assess the completion of the target.
- vi. A summary of the electrical corporation’s assessment of completing the target following use of the verification method identified in v above, including a listing of all evidence relied upon in the electrical corporation’s assessment.
- vii. For each target that the electrical corporation failed to complete, a detailed explanation of what was incomplete, why, and associated corrective actions the electrical corporation has taken to prevent recurrence of such failures.
 1. If the electrical corporation did not take corrective action to prevent recurrence of such failures, it must explain its justification for such inaction.
- viii. An explanation of whether the expected percentage risk reduction,¹⁶ as listed in the WMP, was achieved during the most recently completed compliance period.
 1. If the expected percentage risk reduction was not achieved, the electrical corporation must explain why and discuss any corrective actions it has taken as a result.
 2. If the electrical corporation did not take corrective action, it must explain its justification for such inaction.

¹⁴ For example, for the 2023 WMP compliance period, the pertinent columns from exemplar Tables 8-3 and 8-4 in the 2023-2025 WMP Technical Guidelines would include those titled: “2023 Target & Unit,” “Target End of Q2 2023 & Unit,” “Target End of Q2 2023 & Unit,” and “End of Year Target 2023 & Unit.”

¹⁵ The value listed in the “Method of Verification” column in the associated tables in Section 8 of the most recently approved WMP. See 2023-2025 WMP Technical Guidelines, pages 75-79.

¹⁶ The value listed in the columns titled “x% Risk Impact” in the associated tables in Section 8 of the WMP, and correlated to the respective compliance period, for the identified target. See 2023-2025 WMP Technical Guidelines, pages 78-79.

- ix. An assessment of quality of implementation for initiatives that have a quality control/quality assurance component.
2. A complete listing of all change orders requested by the electrical corporation that were approved by Energy Safety. For each change order, the electrical corporation must include a description of the change requested, the date the electrical corporation requested the change order, and the date that Energy Safety approved the requested change order.
3. A list that includes the following information for each WMP initiative identified in the WMP:
 - a. Utility Initiative Tracking ID, per WMP Guidelines.
 - b. Initiative name.
 - c. Planned budget (as reported in the WMP or approved Change Order) for the compliance period.
 - d. Actual expenditure for the most recently completed compliance period.
 - e. If the actual expenditure is greater or less than the planned budget by 10%, provide a detailed explanation of the reason or reasons for the discrepancy.

5.0 INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

The requirements, standards, and protocols outlined in this section are applicable to the 2023 WMP plan year and subsequent WMPs.

In consultation with the Office of the State Fire Marshall (OSFM), Energy Safety must annually publish a list of independent evaluators with experience assessing the safe operation of electrical infrastructure before March 1. To meet this obligation, Energy Safety and OSFM publish a request for qualifications (RFQ) to solicit applications from firms interested in being enlisted. The RFQ establishes the submission requirements, minimum qualifications, conflict of interest disclosure requirements, scope of work, and schedule for the independent evaluations, among other information. Following the receipt of applications through the RFQ process, Energy Safety and OSFM review applications and determine whether minimum qualifications have been met and required documents and disclosures have been provided.

Following the completion of this effort, Energy Safety publishes the list of qualified independent evaluators. Depending on the volume of applications received, the number of enlisted firms, and receipt of interest from additional firms, Energy Safety and OSFM may repost the RFQ to solicit additional applications.

Following the publication of the independent evaluator list, each electric corporation must hire an independent evaluator from the list of approved evaluators. The independent evaluator must review and assess the electrical corporation's compliance with its WMP and issue a report on July 1 of each year in which an EC ARC is filed.¹⁷ Each independent evaluator that is engaged in a contract with an electrical corporation to assess WMP compliance works under the direction of Energy Safety.

In furtherance of this requirement, electrical corporations must follow the following directions:

- (a) Within five (5) business days following Energy Safety's publication of the list of qualified independent evaluators, each electrical corporation must disclose via email (compliance@energysafety.ca.gov) the following information for all contracts with any of the enlisted independent evaluators within the last three (3) years: date of contract execution, duration of the contract, scope of work, compensation rates, and total contract value.
- (b) Within three (3) business days following the execution of a contract with an approved independent evaluator, the electrical corporation must provide its contracted independent evaluator with a complete listing of all commitments within its most recently approved WMP.
- (c) Unless otherwise specified by the independent evaluator, within three (3) business days following receipt of a data request from the contracted independent evaluator, the electrical corporation must provide the information requested.
- (d) The electrical corporation must copy Energy Safety (compliance@energysafety.ca.gov) on all written communications between the electrical corporation and its contracted independent evaluator.

¹⁷ Pub. Util. Code § 8386.3(c)(2).

- (e) The electrical corporation must invite Energy Safety (compliance@energysafety.ca.gov) to all meetings between the electrical corporation and the respective contracted independent evaluator.
- (f) Electrical corporations are prohibited from viewing the independent evaluators' reports or related work products prior to Energy Safety publishing the reports.

The selected independent evaluators must follow the following directions for the duration of their evaluations:

- (a) The independent evaluators must copy Energy Safety (compliance@energysafety.ca.gov) on all written communications between the independent evaluator and the electric corporations with which it has a contract.
- (b) The independent evaluators must follow the directions of Energy Safety, including the terms in the Energy Safety developed RFQ scope of work and other direction regarding the form and contents of the report.
- (c) The independent evaluators must schedule and attend weekly meetings with Energy Safety.
- (d) The independent evaluators must provide Energy Safety with agendas, meeting minutes, and presentation materials for meetings with Energy Safety to the Compliance inbox (compliance@energysafety.ca.gov) within two business days following the meeting.
- (e) The independent evaluators must produce meeting minutes and interview notes for all interactions with the electric corporations. The independent evaluators must then provide these materials upon final delivery of their independent evaluator assessment.
- (f) Upon submission of their independent evaluator assessments, the independent evaluators must provide Energy Safety all files, documents, and evidence that the independent evaluator relied upon to make the conclusions in its independent evaluator assessment, including all meeting minutes and interview notes.
- (g) The independent evaluator's annual report on compliance (IE ARC) must clearly state the following dates:
 - a. Date which the contract between the independent evaluator and electrical corporation was executed.
 - b. Date when the independent evaluator commenced its evaluation.

6.0 AUDITS

6.1 Substantial Vegetation Management Audit

The requirements, standards, and protocols outlined in this section are applicable to the 2021 WMP plan year and subsequent WMPs.

Energy Safety annually conducts an audit of an electrical corporation's compliance with the vegetation management requirements in its approved WMP.¹⁸ Energy Safety refers to this audit as the "Substantial Vegetation Management" (SVM) audit.

Upon receipt of an electrical corporations' notice that its vegetation management work has been completed, Energy Safety will initiate an audit of the electrical corporation's vegetation management activities for the compliance period. Following completion of its audit, Energy Safety will provide the electrical corporation an initial audit report that identifies deficiencies. The electrical corporation must respond to Energy Safety's initial audit report within 30 days, unless another date is specified in the initial audit report. The electrical corporation's response must include:

1. A description of the corrective actions the electrical corporation has taken or plans to take to correct or eliminate each deficiency identified in the initial audit report, including supporting documentation.
2. Response must be titled "[ELECTRICAL CORPORATION]'s_ [YEAR] SVM Audit Corrective Action Plan_MMDDYYYY"

Following the receipt and review of the electrical corporation's response, Energy Safety will issue a final audit report to the electrical corporation. The final audit report will identify whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in its most recently approved WMP.

For purposes of the SVM Audit, substantial compliance with the substantial portion of vegetation management requirements means that the electrical corporation's deficiencies,

¹⁸ Pub. Util. Code § 8386.3(c)(5)

as identified in the initial audit report, and corresponding corrective actions response are deemed to have, in aggregate:

- 1) Not hindered the electrical corporation's ability to achieve the objectives of its vegetation management programs.
- 2) Constituted a good faith effort to comply with the vegetation management requirements in the approved WMP.
- 3) Completed the large majority of the vegetation management requirements in its approved WMP.

6.2 Other Audits

Energy Safety may conduct other audits as necessary to evaluate electrical corporation performance to its WMP. Energy Safety will give notice of audits, including requirements for data submissions, to electrical corporations prior to commencement. Submission deadlines will be contained within the respective notification of audit.

7.0 ENERGY SAFETY ANNUAL REPORTS ON COMPLIANCE

The requirements, standards, and protocols outlined in this section are applicable to the 2021 WMP plan year and subsequent WMPs.

Energy Safety presents the findings of its review of an electrical corporation's compliance with the WMP in its Annual Report on Compliance (ARC).¹⁹ The scope of Energy Safety's review in the ARC is limited to actions taken and performance during the applicable compliance period. Energy Safety will issue the ARC no later than 18 months following the receipt of the EC ARC.¹⁹

7.1 Elements of Analysis

In performing its review, Energy Safety considers the totality of all compliance assessments completed with respect to an electrical corporation's approved WMP within the compliance

¹⁹ Pub. Util. Code § 8386.3(c)(4)

period. This includes all inspection, audit, investigation, and data analysis work performed by Energy Safety, as well as separate EC ARC and IE ARC evaluations of WMP compliance. Energy Safety reviews and considers information (1) provided by the electrical corporation and related to compliance with its WMP, (2) provided by the independent evaluator's review of the electrical corporation's compliance with its WMP, (3) documented in Energy Safety's field inspections, (4) documented in Energy Safety's audits, (5) developed through Energy Safety's analysis of data provided by the electrical corporation, and (6) provided by the electrical corporation in response to information requests or during meetings with Energy Safety.

7.1 Evaluation Criteria

Energy Safety's ARC evaluates whether the electrical corporation complied with its WMP. Energy Safety assesses an electrical corporation's compliance with discrete WMP commitments for each initiative and wholistically evaluates the electrical corporation's execution of the WMP. Energy Safety's evaluation considers the following:

- 1) Whether the electrical corporation implemented the wildfire mitigation initiatives in its approved WMP, looking specifically at whether the electrical corporation funded and performed the commitments stated for each initiative.²⁰
- 2) Whether the electrical corporation achieved its stated goals and objectives of its plan.
- 3) Whether the electrical corporation completed the initiatives essential to reducing wildfire risk and achieving its objectives.
- 4) The performance of the electrical corporation's infrastructure relative to its wildfire risk, as measured by changes in the occurrence of events that correlate to wildfire risk.
- 5) Whether the electrical corporation made a good faith attempt to comply with its WMP.
- 6) Whether the electrical corporation exhibited issues related to its execution, management, or documentation in the implementation of its WMP. This analysis may expand beyond the scope of any single WMP initiative.

²⁰ Energy Safety evaluates funding data to ensure electrical corporations are dedicating resources to their initiative commitments. Energy Safety does not evaluate whether the cost of implementing each electrical corporation's plan was just and reasonable.

8.0 FILE SUBMISSION & NAMING CONVENTION

The requirements, standards, and protocols stated in this section apply to all file submissions received after the effective date of these Guidelines.

All documents must be submitted to the relevant year's docket (e.g. documents related to the 2021 substantial vegetation management audit must be submitted to the docket titled 2021_SVM or to the compliance inbox).

Electronic file names submitted for the above processes and associated document/data submissions must follow the standardized electronic naming convention with an underscore between the character string as follows: "<name of electrical corporation_document name_YYYYMMDD [date of submission]_document type>." Electrical corporation names may be abbreviated as follows:

- "BVES" (Bear Valley Electrical Services)
- "LU" (Liberty Utilities)
- "HWT" (Horizon West Transmission)
- "LS" (LS Power Grid California)
- "PC" (PacifiCorp)
- "PGE" (Pacific Gas and Electric Company)
- "SCE" (Southern California Edison)
- "SDGE" (San Diego Gas and Electric)
- "TBC" (Trans Bay Cable)

See examples of electronic file names below.

Examples:

- Response to an NOV: "PGE_NOV-CAC5-2023-08-10-1159_20230905_Response", which refers to PG&E's response submitted on September 5, 2023 to NOV_CAC5_20230810_1159.
- EC ARC: "SCE_2023ARC_20240331", which refers to SCE's 2023 Annual Report on Compliance submitted on March 31, 2024.
- IE ARC: "PC_2023-WMP-IE-ARC_20230711", which refers to PacifiCorp's IE's ARC on the 2023 WMP submitted on July 11, 2023.

- Response to an SVM audit: “BVES_2023 SVM Audit Response_20230904”, which refers to BVES’ response submitted on September 4, 2023 to Energy Safety’s 2023 SVM Audit.

Table 2: Expected Electronic File Submission Locations

Document Type	Submission Location
“NOV Response” (Response to Notice of Violation)	Applicable NOV docket within Energy Safety’s E-Filing system
“NOD Response” (Response to Notice of Defect)	Applicable NOD docket within Energy Safety’s E-Filing system
“NOV Corrective Action” (Documentation supporting corrective action)	Email to compliance@energysafety.ca.gov or w/Re (Wildfire Information & Reporting Application for Energy Safety) as directed by Energy Safety.
“NOD Corrective Action” (Documentation supporting corrective action)	Email to compliance@energysafety.ca.gov or w/Re (Wildfire Information & Reporting Application for Energy Safety) as directed by Energy Safety.
“[ELECTRICAL CORPORATION NAME]’s [APPLICABLE WMP YEAR] ARC” (Annual Report on Compliance)	Applicable EC ARC docket within Energy Safety’s E-Filing system
“SVM Notice” (Notice from the electrical corporation that it completed a substantial portion of its vegetation management requirements)	Applicable SVM docket within Energy Safety’s E-Filing system
“[ELECTRICAL CORPORATION]’S SVM Audit Corrective Action Plan”	Applicable SVM docket within Energy Safety’s E-Filing system

Document Type	Submission Location
(Substantial Vegetation Management Audit Response)	
Data Request Responses	Email to compliance@energysafety.ca.gov or wIRe (Wildfire Information & Reporting Application for Energy Safety) as directed by Energy Safety.

9.0 ACCESSIBILITY

It is the policy of the State of California that electronic information be accessible to people with disabilities. Each person who submits information through Energy Safety's e-filing system must ensure that the information complies with the accessibility requirements set forth in Government Code section 7405. Energy Safety will not accept any information submitted through the e-filing system that does not comply with these requirements.²¹

²¹ References to laws and regulations related to digital accessibility are available on the Department of Rehabilitation's website [here](https://dor.ca.gov/Home/DisabilityLawsandRegulations) (https://dor.ca.gov/Home/DisabilityLawsandRegulations, accessed May 2, 2023). Also see the Department of Rehabilitation's [resources on constructing digitally accessible content](https://www.dor.ca.gov/Home/ConstructingAccessibleContent) (https://www.dor.ca.gov/Home/ConstructingAccessibleContent, accessed May 2, 2023).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 20th Floor
Sacramento, CA 95814
916.902.6000

