

**LS Power Grid California LLC
ANNUAL REPORT ON COMPLIANCE FOR 2023**

for Submittal to:

**CALIFORNIA OFFICE OF ENERGY
INFRASTRUCTURE SAFETY**

California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, California 95814



P.O. Box 666
Pittsburg, California 94565

March 2024

Instructions:¹ The Annual Report on Compliance submitted by each EC shall include a written narrative including:

1. A written narrative including:

- 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. Progress must be discussed individually for each stated objective.
- A clear description of the electrical corporation's progress towards achieving the three-year objectives listed in the tables in Section 8 of its WMP, including all subsections, with completion dates within the recently completed compliance period. Each objective must be discussed individually and, at a minimum, include the following:
 - A listing of the initiative(s) and associated tracking identification numbers the electrical corporation is implementing to achieve the objective.
 - Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective are documented and substantiated.
 - The completion date listed in the approved WMP.
 - A summary of the electrical corporation's progress made during the most recently completed compliance period.
- A detailed assessment of the electrical corporation's completion of the three-year objectives listed in the tables in Section 8 of its WMP, including all subsections, with completion dates within the most recently completed compliance period. Each stated objective must be discussed individually and, at a minimum, include the following information:
 - A listing of the initiatives and associated tracking identification numbers the electrical corporation is implementing to achieve the objective.
 - Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective are documented and substantiated.
 - The completion date listed in the approved WMP.
 - The date the electrical corporation actually completed the objective.
 - An explanation of how the electrical corporation utilized the identified "Method of Verification" to assess the completion of the objective.
 - A summary of the electrical corporation's assessment of progress towards completing the objective following use of the verification method identified in the above task, including a listing of all evidence relied upon in the electrical corporation's assessment.
 - 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.
 - If the electrical corporation did not take corrective action to prevent recurrence of such failures, it must explain its justification for such inaction.

- *An assessment of the electrical corporation’s completion of all targets identified for each initiative listed in the tables in Section 8 of its WMP, including all subsections, with target completion dates within the most recently completed compliance period. The assessment of each target must be discussed individually and, at a minimum, include the following information:*
 - *A complete listing of all applicable targets.*
 - *The target value and associated target units.*
 - *The target completion date (i.e., year-end, Q2, Q3, etc.) listed in the WMP.*
 - *The date the electrical corporation actually completed the target.*
 - *An explanation of how the electrical corporation utilized the identified “Method of Verification” to assess the completion of the target.*
 - *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.*
 - *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.*
 - *An explanation of whether the expected percentage risk reduction, 16 as listed in the WMP, was achieved during the most recently completed compliance period.*
 - *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.*
 - *If the electrical corporation did not take corrective action, it must explain its justification for such inaction.*
- 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:*
 - *Utility Initiative Tracking ID, per WMP Guidelines.*
 - *Initiative name.*
 - *Planned budget (as reported in the WMP or approved Change Order) for the compliance period.*
 - *Actual expenditure for the most recently completed compliance period.*
 - *If the difference between the actual expenditure and the planned budget is more than 10%, provide a detailed explanation of the reason or reasons for the discrepancy.*

LS Power Grid California, LLC (LSPG-CA) is a wholly owned subsidiary of LS Power and a California Electrical Corporation classified as an Independent Transmission Operator (ITO) by Energy Safety. LSPG-CA has no transmission lines or distribution facilities planned or in operation during the current Wildfire Mitigation Plan (WMP) cycle. LSPG-CA has two 500 kilovolt (kV) substation facilities (Fern Road and Orchard) under construction in 2024, with both planned to be in-service in 2025. The Fern Road Substation site is located in eastern Shasta County on the western slope of the Sierra Nevada foothills, east of Redding, Shasta County, California. The Fern Road Substation site and most of the project area is categorized as a California Department of Forestry and Fire Protection (CAL FIRE) State Resource Area (SRA) High and Very High Fire Hazard Severity Zones (FHSZs), dominated by hardwood forests/woodland. The Orchard Substation site is located on the valley floor of the Central Valley of California in western Fresno County, approximately 13 miles east of the town of Coalinga, 13 miles north of Kettleman City, and 2 miles east of I-5. The substation site and most of the project area is categorized as a CAL FIRE Local Resource Area (LRA) FHSZ of non-wildland/non-urban, dominated by irrigated agricultural land.

¹ Text in blue italics are instructions from the Wildfire Safety Division

Note: Due to having no baseline risk values and no insightful way to calculate risk reduction performed by initiatives, no values were included in the 2023-2025 Wildfire mitigation plan and therefore left out of this report as well.

1. LS Power Grid’s three-year objectives for its 2023-2025 Wildfire mitigation plan for its various areas of focus are as follows:
 - a. LSPG-CA’s 3-year objective for grid design, operations, and maintenance is to enhance work safety procedures in areas identified as High Fire Threat Districts (HFTD) and High Fire Risk Areas (HFRA) and safely transition from construction to operation of both substation facilities. These three-year objectives can be found in section 8.1.1.1 and on pages 101 and 102 of LS Power’s 2023-2025 Wildfire Mitigation plan. To achieve these objectives the following initiatives were developed:
 - i. To enhance work safety within fire risk areas the LSP-01 initiative to Implement Hot Work Programs during construction and maintenance activities was developed. Hot work programs have been implemented at both substation sites and are being followed by construction personnel to reduce the risk of wildfires. This meets the WMP-stated April 2023 completion date. As neither site is currently in operation, the transition from maintenance to operations has yet to occur but Hot Work Programs will continue to be applied to maintenance activities during the operational phases.
 1. The method of verifying this task was complete was an updated Worker Environmental Awareness Program (WEAP). In LS Power’s WEAP, Hot Work Programs are listed as required and must meet various minimum requirements to enhance safety. WEAP training is required and followed by all personnel at each site.
 2. There were no targets identified in 2023 for this initiative.
 - ii. The second stated objective to safely transition from construction to operations was not scheduled to occur in 2023. As such, initiative LSP-02 to implement substation inspection program was not scheduled for implementation until later in 2024 as stated in the 2023 Wildfire Mitigation Plan. Per the current project schedule for the Orchard Substation, LSP-02 is currently on track for completion in early 2025.
 1. Once in effect substation inspection reports will be used to verify the completion of this initiative.
 2. There were no targets identified in 2023 for this initiative.
 - b. LSPG-CA’s 3- year and 10-year objective for vegetation management and inspections is to establish and maintain a substation vegetation management program to reduce the risk of vegetation contact and potential wildfire spread. This objective can be found in section 8.2.1.1 on pages 119 and 120 of LS Power’s 2023-2025 Wildfire Mitigation Plan. To achieve this objective the following initiatives were developed:
 - i. LSP-04 - Establish and maintain a vegetation management program to reduce the risk of vegetation contact and potential wildfire spread. This initiative will be completed once the substations become operational as stated on page 120 of LS Power’s 2023-2025 Wildfire Mitigation plan. LSP-04 is currently progressing per the timeline in the 2023 WMP, with the first

substation currently scheduled for completion in January 2025.

1. Once in practice maintenance procedures and inspection reports will be used to verify the establishment of and adherence to the vegetation management program.
 2. There were no targets identified in 2023 for this initiative.
- c. LSPG-CA's 3-year objective for situational awareness and forecasting is to establish and maintain an environmental monitoring and weather forecasting program that informs measures to reduce the risk of wildfires from environmental or weather-related conditions. This objective can be found in section 8.3.1.1 and on pages 131 and 132 of LS Power's 2023-2025 Wildfire Mitigation Plan with a target completion date of December 2024. The following initiatives were developed to accomplish this objective:
- i. Initiative LSP-05 is to integrate StormGeo, a weather forecasting support tool, into operational practices. Utilizing this technology will better allow LSPG-CA to monitor weather and adjust to ambient conditions to ultimately reduce risks. This integration is scheduled to occur in late 2024 and is currently on track. StormGeo weather monitoring is currently being utilized to support construction activities and will ultimately be integrated into transmission operations.
 1. Updated work procedures outlining StormGeo use in operations will be used to verify completion.
 2. There were no targets identified in 2023 for this initiative.
 - ii. Initiative LSP-06 is to install substation cameras with a completion date of December 2024. The Orchard Substation cameras are on track for installation in 2024, with the Fern Road Substation cameras following in 2025.
 1. Site commissioning documentation will be used to verify the installation of these cameras.
 2. There were no targets identified in 2023 for this initiative.
- d. LSPG-CA's 3-year objectives for emergency preparedness are to establish relationships with local public safety and fire agencies to ensure site location and access information are integrated into relevant dispatch systems. Complete integration into local safety agencies is expected to be completed in 2024. Site specific safety plans have also been developed and implemented by LS Power contractors to establish fire safe construction practices in 2023. These objectives can be found in section 8.4.1.1 and on pages 141 and 142 of LS Power's 2023-2025 Wildfire Mitigation Plan. The following initiatives were developed to accomplish the above-stated objectives:
- i. Initiative LSP-08 is to integrate into local dispatch systems by June 2024. Local public safety officials at both substation areas have been contacted and site-specific information has been provided to CalFire. Efforts are underway to verify that the substation site locations are accurately captured in the local dispatch systems and the initiative is on track for completion by the date stated in the 2023 WMP.
 1. This initiative will be tracked by saving records of communication.
 2. There are no WMP targets associated with this initiative.
 - ii. Initiative LSP-09 is to establish relationships with local fire agencies. This initiative has been completed by exceeding the target visits for local

agencies between the two substation locations in 2023. Various communications related to LSP-09 have taken place and working relationships with the local fire agencies have been established.

1. The method of verifying the completion of this task is records of meetings with local agencies.
2. The 2023 target for this initiative was two meetings with local fire agencies, which was met and exceeded.

e. LSPG-CA’s 3-year objective for community outreach and engagement is to establish and maintain relationships with local agencies and officials by June 2024. This objective can be found in section 8.5.1.1 on pages 174 and 175 of LS Power’s 2023-2025 Wildfire Mitigation plan. The initiative listed below was developed and implemented to accomplish this objective.

- i. Because LSPG-CA is a transmission-only utility with no electric customers, Initiative LSP-09 is also supporting this objective. This initiative has been completed by exceeding the target visits for local agencies in 2023. Various communications related to LSP-09 have taken place and working relationships with the local fire agencies have been established.

2. LS Power requested no change orders during the 2023 compliance period.
3. 2023 planned and actual spend for Wildfire Mitigation initiatives.

Table 1 – Summary of WMP Initiatives and Expenditures (\$ Thousands)

Initiative ID	Initiative Name	Planned Spend	Actual Spend	Difference explanation
LSP-01	Implement Hot Work Programs during construction and maintenance activities	0	0	
LSP-02	Implement Substation Inspection Program	30	0	This initiative is yet to kick off and had no actual costs
LSP-03	Enhance use of Computer Maintenance Management Systems (CMMS)/automation into LSPG-CA maintenance work orders	10	0	This initiative is yet to kick off and had no actual costs
LSP-04	Establish risk-based buffer zones and implement monthly substation inspection program once operational	0	0	
LSP-05	Integrate StormGeo into decision-making and safety practices	10	0	This initiative is yet to kick off and had no actual costs

LSP-06	Implement 24/7 video security surveillance at substation locations	0	0	
LSP-07	Evaluate and enhance use of live video	0	0	
LSP-08	Establish and ensure integration into Local Public Safety Computer dispatch systems	10	Absorbed into capital projects	These efforts were handled quickly over email and accrued little to no cost
LSP-09	Work to build relationships with local fire agencies and conduct annual visits	0	16	Multiple trips were scheduled for employees to meet with local personnel
LSP-10	Establish continuous improvement of emergency plan and procedures	0	0	
LSP-11	Formalize mechanisms to share lessons learned among ITO peers	10	0	This initiative is yet to kick off and had no actual costs