



July 26, 2024

To: Compliance Enforcement Docket (#Compliance Guidelines)

Re: Notice of Opportunity for Public Comment on Revisions to Proposed Updates to WMP Compliance Guidelines

The Office of Energy Infrastructure Safety (Energy Safety) is seeking written public comments on revisions to the proposed updates to WMP Compliance Guidelines. Only the revisions, outlined below, are subject to public comment at this time.

The original proposed updates to the WMP Compliance Guidelines were published for public comment on June 5, 2024, with written comments due July 5, 2024. A public meeting was held July 16, 2024, during which members of the public could provide verbal public comments on the original proposed updates to the WMP Compliance Guidelines.

Energy Safety is proposing the following revisions to the original proposed updates to the WMP Compliance Guidelines in response to some of the public comments received:

- Section 5.0 (page 6): add “it uses” to clarify that the reference to construction standards is to those used by an electrical corporation in executing WMP initiatives.
- Section 7.0 (page 10): revise the deadline for which an electrical corporation must have an executed contract with an independent evaluator from 45 days to 60 days after Energy Safety publishes the list of independent evaluators.

Instructions for Submitting Written Public Comments

Anyone interested in submitting written comments on the revisions to the proposed updates to the WMP Compliance Guidelines may submit comments through [Energy Safety's Electrical: Compliance Enforcement – Compliance Guidelines docket](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=Compliance%20Guidelines) (<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=Compliance%20Guidelines>).

Energy Safety will accept written comments through **August 26, 2024**. Energy Safety requests that commenters name the files submitted following this pattern: “[*Commenter Name*] – Revisions to Proposed Updates to Compliance Guidelines Comments.” Commenters are encouraged to provide redlines for any changes they recommend to the revisions to the proposed updates to the WMP Compliance Guidelines.

Document Availability

The revisions to the proposed updates to the WMP Compliance Guidelines are available on Energy Safety's Electrical: Compliance Enforcement – Compliance Guidelines docket. To receive notifications when new documents are published, sign up to Energy Safety's Compliance Enforcement Service List. Existing subscribers to the Compliance Enforcement Service List will continue to receive notifications for all Electrical: Compliance Enforcement dockets. For information on subscribing to Energy Safety's service lists, visit [Energy Safety's webpage for participating in Energy Safety proceedings](https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/) (https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/).

For questions regarding this notice and the revisions to the proposed updates to the WMP Compliance Guidelines, contact Energy Safety via email at compliance@energysafety.ca.gov with the subject line: "Revisions to Proposed Updates to WMP Compliance Guidelines."

Sincerely,



Patrick Doherty
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety



OFFICE OF ENERGY INFRASTRUCTURE SAFETY COMPLIANCE GUIDELINES

DRAFT 2

JUNE 5 JULY 26, 2024

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1.0 INTRODUCTION

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

1.1 Authority

The Office of Energy Infrastructure 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 Public Utilities Code 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. Commitments include targets.

“Compliance period” – January 1 to December 31 of each calendar year.

“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.

“Goals” – The electrical corporation’s general intentions and ambitions.

“Initiative” – Measure or activity, either proposed or in process, designed to reduce the consequences and/or probability of wildfire or Public Safety Power Shutoff (PSPS).

“Initiative construction standards” – The standard specifications, special provisions, standards of practice, standard material and construction specifications, construction protocols, and construction methods that an electrical corporation applies to activities undertaken by the electrical corporation pursuant to a WMP initiative in a given compliance period.

“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. Electrical corporations will show progress toward completing targets in subsequent reports, including Quarterly Data Reports (QDRs) and WMP Updates.

“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

3.1 Notice

Energy Safety may determine that an electrical corporation 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 noncompliance or defect.³ The corrective action directed by Energy Safety may consist of a requirement to inspect, assess, or 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.

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 in accordance with the timelines provided in Table 1.⁴ Otherwise, Energy Safety may prescribe a timeframe for resolution of a violation or defect.

Table 1: Energy Safety Violation and Defect Correction Timelines 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 high fire threat district (HFTD) Tier 3) • 6 months (in HFTD Tier 2) • 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

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 CPUC Resolution SPD-7, Attachment 1, § 2.5.2, page 9.

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 Section 3.3. When requesting 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 emailed to Compliance@energysafety.ca.gov, with a copy sent to all Energy Safety's Compliance Assurance Division staff 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. Electrical corporations may submit supplemental information no later than two (2) business days before the informal conference occurs. An informal conference does not extend the response deadline.

3.3 Response

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

- (1) Within 30 calendar days,⁵ for each violation or defect identified, provide a written response to Energy Safety that states either:
 - (a) 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

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.

(b) The electrical corporation will not correct the violation or defect, including the electrical corporation's reasoning or justification for inaction and all supporting documentation.

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

(a) Before and after photographs demonstrating that the violation or defect has been corrected.

(b) A corrected version of a dataset, record, or document identified in an NOV or NOD as erroneous or deficient.

(c) Work orders or other records documenting the action taken, the date that action was taken, and a point of contact who can provide additional information regarding the action taken.

All files submitted by electrical corporations in accordance with the above must be named and submitted as required in dedicated section below.

4.0 WILDFIRE SAFETY CONCERNS

During its inspections of an electrical corporation's infrastructure, Energy Safety may observe certain conditions that lead it to believe that the risk of wildfire would subsequently increase. When this occurs, Energy Safety may email the electrical corporation a list of these conditions, known as Wildfire Safety Concerns (WSCs). The WSCs, their descriptions, and associated details such as location information will be provided to the electrical corporation in a spreadsheet attached to the email notification.

Within 10 business days of receipt, the electrical corporation must reply to the email and inform Energy Safety of whether it intends to take corrective action for each of the WSCs. If the electrical corporation does not intend to take corrective action for a given WSC, it must explain why.

If an electrical corporation intends to take corrective action on a WSC, the electrical corporation shall report to Energy Safety by replying to the email on the status of such corrective action of the WSC by the 10th day of each calendar quarter. Once the corrective action for a given WSC is complete, no further reporting on that WSC is required.

5.0 WILDFIRE MITIGATION PLAN INITIATIVE CONSTRUCTION STANDARDS

Electrical corporations shall provide Energy Safety with copies of initiative construction standards [it uses](#) that are applicable to field verifiable WMP initiatives in a given compliance period. Electrical corporations should consult with Energy Safety staff if they are uncertain as to which WMP initiatives are field verifiable. Energy Safety may refer to these initiative construction standards when determining if a condition observed during a field inspection is a potential violation, defect, or WSC.

The initiative construction standards shall be provided annually by March 31 via a secure data transfer system specific to individual electrical corporations.⁶ Any update to an initiative construction standard shall be sent to Energy Safety via the secure file transfer system no later than two weeks after the update becomes effective. Energy Safety requires that files submitted be named in accordance with the dedicated file naming section below.

6.0 ELECTRICAL CORPORATION ANNUAL REPORT ON COMPLIANCE

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.⁷ Accordingly, the EC ARC is due annually on the State business day following March 31. See the section for instructions on file submission and naming convention below. The EC ARC is an electrical

⁶ Email is not always feasible due to large file sizes.

⁷ Pub. Util. Code § 8386.3

corporation's annual self-assessment of compliance with its approved WMP during the recently completed compliance period. The EC ARC must include:

(1) A written narrative including:

- (a) A description of the electrical corporation's progress towards achieving the summarized objectives for the three- and ten-year WMP plan cycles, as identified in its most recently approved WMP.⁸ Progress must be discussed individually for each stated objective.
- (b) A description of the electrical corporation's progress towards achieving the three- and ten-year detailed objectives⁹ listed in the tables in Section 8 of its WMP, including all subsections, with completion dates¹⁰ within the recently completed compliance period. Each objective must be discussed individually and, at a minimum, include the following:
 - 1. A listing of the initiative(s) and associated tracking identification numbers the electrical corporation is implementing to achieve the objective.
 - 2. Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective are documented and substantiated.
 - 3. The completion date listed in the approved WMP.
 - 4. A summary of the electrical corporation's progress made during the most recently completed compliance period.
- (c) An assessment of the electrical corporation's completion of the three- and ten-year objectives¹¹ listed in the tables in Section 8 of its WMP, including all subsections, with completion dates¹² within the most recently completed compliance period. Each stated objective must be discussed individually and, at a minimum, include the following information:

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 (e.g., 8.1, 8.2, etc.) in the column titled "Objectives for Three Years" or "Objectives for Ten Years" (see exemplar Tables 8-1 and 8-2 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.

¹¹ See Section 8 of the 2023-2025 WMP Technical Guidelines, as further defined in tables for each subsection (e.g., 8.1, 8.2, etc.) in the column titled "Objectives for Three Years" or "Objectives for Ten Years" (see exemplar Tables 8-1 and 8-2 on page 77 of 2023-2025 WMP Technical Guidelines).

¹² The date listed in the "Completion Date" column in the associated tables in Section 8 of the WMP.

1. A listing of the initiatives and associated tracking identification numbers the electrical corporation is implementing to achieve the objective.
 2. Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective are documented and substantiated.
 3. The completion date listed in the approved WMP.
 4. The date the electrical corporation actually completed the objective.
 5. An explanation of how the electrical corporation utilized the identified “Method of Verification”¹³ to assess the completion of the objective.
 6. A summary of the electrical corporation’s assessment of completing the objective following use of the verification method described above, including a listing of all evidence relied upon in the electrical corporation’s assessment.
 7. Whether activities counting toward completion of the objective in a given compliance year were carried over from previous compliance years, and if so to what degree.
 8. 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.
 9. If the electrical corporation did not take corrective action to prevent recurrence of such failures, it must provide justification for such inaction.
- (d) An assessment of the electrical corporation’s completion of all targets¹⁴ 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.¹⁵ The assessment of each target must be discussed individually and, at a minimum, include the following information:
1. A complete listing of all applicable targets.
 2. The target value and associated target units.

¹³ 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.

¹⁴ See Section 8 of the 2023-2025 WMP Technical Guidelines, as further defined in tables for each subsection (e.g., 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).

¹⁵ 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.”

3. The target completion date (i.e., year-end, Q2, Q3, etc.) listed in the WMP.
 4. The date the electrical corporation actually completed the target.
 5. An explanation of how the electrical corporation utilized the identified “Method of Verification”¹⁶ to assess the completion of the target.
 6. A summary of the electrical corporation’s assessment of completing the target following use of the verification method described above, including a listing of all evidence relied upon in the electrical corporation’s assessment.
 7. Whether activities counting toward completion of the target in a given compliance year were carried over from previous compliance years, and if so to what degree.
 8. 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. If the electrical corporation did not take corrective action to prevent recurrence of such failures, it must provide justification for such inaction.
 9. An explanation of whether the expected percentage risk reduction,¹⁷ as listed in the WMP, was achieved during the most recently completed compliance period.
 - a. If the expected percentage risk reduction was not achieved, the electrical corporation must explain why and discuss any actions it has taken as a result.
 - b. If the electrical corporation did not take action, it must provide justification for such inaction.
 10. 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

¹⁶ 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.

¹⁷ 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.

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 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 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.

7.0 INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

In consultation with the Office of the State Fire Marshal (OSFM), Energy Safety must annually post on its website a list of independent evaluators with experience assessing the safe operation of electrical infrastructure before March 1. Within ~~60~~45 days after Energy Safety publishes the list of independent evaluators, each electrical corporation must complete execution of a contract with an independent evaluator from that list. The independent evaluator must review and assess the electrical corporation's compliance with its WMP and issue an independent evaluator annual report on compliance (IE ARC) by July 1.¹⁸

The following requirements apply to each electrical corporation:

- (1) To address any potential conflicts of interest, within five (5) business days following execution of a contract with an independent evaluator, each electrical corporation must submit via email to Energy Safety's Compliance inbox (compliance@energysafety.ca.gov)

¹⁸ Pub. Util. Code § 8386.3(c)(2).

the following information for all contracts with the contracted independent evaluator within the last three (3) years: date of contract execution, duration of the contract, scope of work, compensation rates, and total contract value.

- (2) 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.
- (3) 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.
- (4) The electrical corporation must copy Energy Safety's Compliance inbox (compliance@energysafety.ca.gov) on all written communications between the electrical corporation and its contracted independent evaluator.
- (5) The electrical corporation must invite Energy Safety via its Compliance inbox (compliance@energysafety.ca.gov) to all meetings between the electrical corporation and the contracted independent evaluator.
- (6) Electrical corporations are prohibited from viewing the independent evaluators' reports or related work products prior to Energy Safety receiving the reports. Energy Safety may allow electrical corporations to conduct a limited review before reports are published to ensure that confidential information has been appropriately redacted.

The following requirements apply to each contracted independent evaluator throughout the IE ARC evaluations:

- (1) The independent evaluator must copy Energy Safety via its Compliance inbox (compliance@energysafety.ca.gov) on all written communications between the independent evaluator and the electrical corporations with which it has a contract.
- (2) The independent evaluator must follow the directions of Energy Safety, including the terms in the independent evaluator Request for Qualifications (IE RFQ) scope of work developed by Energy Safety and other direction regarding the form and contents of the report.
- (3) The independent evaluator must schedule and attend weekly meetings with Energy Safety.
- (4) For each meeting with Energy Safety, the independent evaluator must send a meeting agenda to the Energy Safety Compliance inbox (compliance@energysafetey.ca.gov) at least one (1) business day prior to the meeting, and must send meeting minutes and

presentation materials to the Compliance inbox within two (2) business days after the meeting.

- (5) The independent evaluator must produce meeting minutes and interview notes for all interactions with the electrical corporations. The independent evaluator must then provide these materials to Energy Safety, separately from the IE ARC, using the Compliance inbox (compliance@energysafety.ca.gov) prior to or upon final delivery of its IE ARC.
- (6) Upon submission of its IE ARC, the independent evaluator must provide Energy Safety all files, documents, and evidence that the independent evaluator relied upon in reaching the conclusions in its IE ARC.
- (7) The IE ARC must include the following dates:
 - (a) Date of execution of the contract between the independent evaluator and electrical corporation; and
 - (b) Date of commencement of the independent evaluator's evaluation.

8.0 AUDITS

8.1 Substantial Vegetation Management Audit

Energy Safety annually conducts an audit of an electrical corporation's compliance with the vegetation management requirements in its approved WMP.¹⁹ Energy Safety refers to this audit as the Substantial Vegetation Management (SVM) audit.

Upon receipt of an electrical corporation's 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 its findings, including any identified deficiencies. For any deficiencies identified during the audit, the electrical corporation must provide Energy Safety a Corrective Action Plan within 30 calendar days of receipt of the audit, unless another date is specified by Energy Safety at the time of issuance. For each initiative with a finding that all work was not performed, the electrical corporation must provide Energy Safety with a response that addresses the following criteria:

1. Should the electrical corporation disagree with an audit finding that all work was not performed per the WMP, the electrical corporation must provide the basis for that

¹⁹ Pub. Util. Code § 8386.3(c)(5)

conclusion including detailed supporting documentation and rationale for that response.

2. If the electrical corporation contends that the intent of the initiative was met because either a large percentage of the work was completed and/or other vegetation management actions taken by the electrical corporation addressed the wildfire risk at issue, the electrical corporation must provide specific details and documentation supporting that conclusion.
3. Should the electrical corporation agree with the audit finding that all work was not performed for a vegetation management initiative, the electrical corporation must provide the following in a corrective action plan:
 - a. Data and/or supporting documents explaining why a commitment was missed,
 - b. The circumstances or mitigating factors as to why a commitment was missed,
 - c. If the electrical corporation was aware of the missed commitment during the compliance period, a detailed accounting of any corrective action measures implemented since the end of the compliance period to avoid future missed commitments including long term strategies to reduce or eliminate wildfire risk, and
 - d. Additional actions the electrical corporation plans to implement to ensure commitments of a similar nature are not missed in the future.
4. The response must be titled “[ELECTRICAL CORPORATION]’s_ [YEAR] SVM Audit Corrective Action Plan_YYYYMMDD.”²⁰

Following receipt and review of the electrical corporation’s response, Energy Safety will issue an audit report to the electrical corporation. The audit report will identify whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the applicable year.

For purposes of the SVM audit report, substantial compliance with the substantial portion of vegetation management requirements means that:

- 1) The electrical corporation’s deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation’s ability to achieve the objectives of its vegetation management programs;

²⁰ “YYYYMMDD” represents the date of submission.

- 2) The electrical corporation's effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP; and
- 3) The electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.

8.2 Other Audits

Energy Safety may conduct other audits as necessary to evaluate electrical corporation performance with respect to its WMP. Energy Safety will notify the electrical corporation prior to commencement of an audit, including requirements for data submissions. Submission deadlines will be contained in the audit notice.

9.0 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 associated Docket (e.g., documents related to the 2021 substantial vegetation management audit must be submitted to either the docket titled 2021_SVM or to the Energy Safety Compliance inbox (compliance@energysafety.ca.gov), depending on which is required for the particular document. See Table 2 for more details.

Electronic file names for documents and 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 Electric Service, Inc.)
- "LU" (Liberty Utilities)
- "HWT" (Horizon West Transmission, LLC)
- "LS" (LS Power Grid California)
- "PC" (PacifiCorp)
- "PGE" (Pacific Gas and Electric Company)
- "SCE" (Southern California Edison)

- “SDGE” (San Diego Gas & Electric Company)
- “TBC” (Trans Bay Cable LLC)

Examples of electronic file names:

- Response to an NOV: “PGE_NOV_CAC5_20230810_1159_20230905_Response” which refers to Pacific Gas and Electric Company’s response submitted on September 5, 2023, to NOV_CAC5_20230810_1159.
- EC ARC: “SCE_2023_ARC_20240331” which refers to Southern California Edison’s 2023 Annual Report on Compliance submitted on March 31, 2024.
- IE ARC: “PC_2023-WMP_IE_ARC_20230711” which refers to PacifiCorp’s independent evaluator’s annual report on compliance on the 2023 WMP submitted on July 11, 2023.
- Response to an SVM audit: “BVES_2021_SVM_Audit_20230904_Response” which refers to Bear Valley Electric Service, Inc.’s response submitted on September 4, 2023, to Energy Safety’s 2021 SVM Audit.

Table 2: Expected Electronic File Submission Locations

Document Type	Submission Location
“NOV Response” (Response to Notice of Violation)	NOV docket for the applicable year within Energy Safety’s e-Filing system
“NOD Response” (Response to Notice of Defect)	NOD docket for the applicable year within Energy Safety’s e-Filing system
“NOV Corrective Action” (Documentation supporting corrective action)	Email to Energy Safety’s Compliance inbox (compliance@energysafety.ca.gov) or wIRe (Wildfire Information & Reporting Application for Energy Safety) as directed by Energy Safety. ²¹

²¹ Use of wIRe as applicable and as directed by Energy Safety.

Document Type	Submission Location
“NOD Corrective Action” (Documentation supporting corrective action)	Email to Energy Safety’s Compliance inbox (compliance@energysafety.ca.gov) or wIRe (Wildfire Information & Reporting Application for Energy Safety) as directed by Energy Safety. ²²
“[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” (Substantial Vegetation Management Audit Response)	Applicable SVM docket within Energy Safety’s e-Filing system
Data Request Responses	Email to Energy Safety’s Compliance inbox (compliance@energysafety.ca.gov) or wIRe (Wildfire Information & Reporting Application for Energy Safety) as directed by Energy Safety. ²³

10.0 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

²² Use of wIRe as applicable and as directed by Energy Safety.

²³ Use of wIRe as applicable and as directed by Energy Safety.

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.²⁴

²⁴ References to laws and regulations related to digital accessibility are available on the [Department of Rehabilitation's webpage on disability laws and regulations](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).