



September 10, 2024

Ross Hohlt  
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LS Power Grid California, LLC  
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**Subject: Rejection and Order to Resubmit for LS Power Grid California, LLC, 2025 Wildfire Mitigation Plan Update**

Mr. Hohlt:

The Office of Energy Infrastructure Safety (Energy Safety) rejects the LS Power Grid California, LLC, (LS Power) 2025 Wildfire Mitigation Plan Update (2025 WMP Update) submission dated July 8, 2024,<sup>1</sup> and orders LS Power to resubmit its 2025 WMP Update, pursuant to Public Utilities Code section 8386.3(a). LS Power's 2025 WMP Update does not conform to the submission requirements outlined in Energy Safety's 2025 WMP Update Guidelines<sup>2</sup> and a conforming plan must be submitted before Energy Safety can perform its substantive evaluation.

**By September 17, 2024, LS Power must file a 2025 WMP Update submission and revised quarterly data report (QDR) submissions that conform to the requirements in Energy Safety's 2025 WMP Update Guidelines, and correct any non-substantive errata listed herein.**

Opening comments on LS Power's resubmitted 2025 WMP Update are due by September 27, 2024. Energy Safety will consider all comments submitted in response to the LS Power 2025 WMP Update in its evaluation, including comments submitted for the initial July 8, 2024, version. Stakeholders may submit additional comments in response to the resubmitted LS Power 2025 WMP Update. Reply comments are due by October 2, 2024, and must be limited to issues raised and representations made in the opening comments of other stakeholders. Opening and reply comments must be submitted to the 2023-2025 Wildfire Mitigation Plan

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<sup>1</sup> [LS Power 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56992&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56992&shareable=true>, accessed August 9, 2024).

<sup>2</sup> [Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan 2024, Published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed July 26, 2024).

docket (#2023-2025-WMPs).<sup>3</sup> Energy Safety's 2023-2025 WMP Process and Evaluation Guidelines provide more information on submitting opening and reply comments.<sup>4</sup>

Sincerely,



Tony Marino  
Acting Deputy Director | Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

Encl: Rejection and Order to Resubmit for LS Power Grid California, LLC, 2025 Wildfire Mitigation Plan Update

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<sup>3</sup> Submit comments via the Energy Safety e-filing system to the [2023-2025-WMPs docket](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs) (<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>, accessed July 23, 2024).

<sup>4</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\) \(adopted Jan. 2024, published Feb. 2024\)](#), Section 6, pp. 10-12 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true>, accessed July 23, 2024).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY  
**REJECTION AND ORDER TO  
RESUBMIT**

**LS POWER GRID CALIFORNIA, LLC  
2025 WILDFIRE MITIGATION PLAN UPDATE**

September 10, 2024

# 1. Introduction

The Office of Energy Infrastructure Safety (Energy Safety) rejects the LS Power Grid California, LLC, (LS Power) 2025 Wildfire Mitigation Plan Update (2025 WMP Update) submission dated July 8, 2024.<sup>1</sup>

LS Power's 2025 WMP Update does not conform to the submission requirements in Energy Safety's 2025 WMP Update Guidelines.<sup>2</sup> Consequently, Energy Safety rejects LS Power's 2025 WMP Update.

LS Power must provide a 2025 WMP Update submission and revised quarterly data report (QDR) submissions that conform to the requirements in Energy Safety's 2025 WMP Update Guidelines, and correct the non-substantive errata listed. Section 5 of this document provides instructions and deadlines for LS Power's resubmission.

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<sup>1</sup> [LS Power 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56992&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56992&shareable=true>, accessed August 9, 2024).

<sup>2</sup> [Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan 2024, Published Feb. 2024\) \(hereafter 2025 WMP Update Guidelines\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed July 26, 2024).

## 2. Non-Conforming Elements

LS Power's 2025 WMP Update does not conform to the submission requirements provided in Energy Safety's 2025 WMP Update Guidelines. The following list outlines the requirements that LS Power's 2025 WMP Update submission did not follow, as well as some specific examples of items LS Power improperly omitted from its 2025 WMP Update or did not address correctly in its 2025 WMP Update and/or its revised 2023-2025 Base WMP. Additionally, the list includes examples of substantive errors in LS Power's 2025 WMP Update submission. This is not a comprehensive list.

1. Updates to 2024 targets, 2024 target completion dates, and 2024 expenditures are not reportable updates for the 2025 WMP Update.<sup>3</sup>
  - a. Section 2.1 *2025 Targets or Target Completion Dates* of LS Power's 2025 WMP Update included updates to its 2024 targets for initiatives LSP-02, LSP-04, LSP-05, and LSP-06.<sup>4</sup> LS Power must remove all updates to 2024 targets from its 2025 WMP Update and any corresponding updates from its 2023-2025 Base WMP (redlined and clean).
2. Each update to a target, objective, or expenditure must include a justification.<sup>5</sup>
  - a. LS Power updated 2025 targets for initiatives LSP-05 and LSP-06<sup>6</sup> without providing justifications for these updates. LS Power must provide justification(s) for its updates to 2025 targets for LSP-05 and LSP-06.
3. The electrical corporation must submit a redlined version of its 2023-2025 Base WMP showing proposed updates to the approved 2023-2025 Base WMP.<sup>7</sup> LS Power's redlined WMP is missing:

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<sup>3</sup> [2025 WMP Update Guidelines](#), p. 13  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed April 29, 2024).

<sup>4</sup> [LS Power 2025 Wildfire Mitigation Plan Update](#), p. 4  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56992&shareable=true>, accessed August 9, 2024).

<sup>5</sup> [2025 WMP Update Guidelines](#), p. 13  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed August 9, 2024).

<sup>6</sup> [LS Power 2025 Wildfire Mitigation Plan Update](#), p. 4  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56992&shareable=true>, accessed August 9, 2024).

<sup>7</sup> [2025 WMP Update Guidelines](#), p. 4  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed April 29, 2024).

- a. The new program to include weather stations at all LS Power substations, described in LS Power’s 2025 WMP Update.<sup>8</sup> LS Power must provide the applicable information on its new program under the corresponding section(s), e.g., Situational Awareness and Forecasting, of its 2023-2025 Base WMP (redlined and clean).

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<sup>8</sup> [LS Power 2025 Wildfire Mitigation Plan Update](#), p. 9

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true>, accessed August 9, 2024).

### 3. Non-substantive Errata

Below are non-substantive errata that LS Power must correct in its 2025 WMP Update in its response to this Rejection and Order to Resubmit. The list includes examples of non-substantive errors in LSP's 2025 WMP Update submission. This is not a comprehensive list.

#### 2025 WMP Update

1. In response to area for continued improvement LS Power-23-01 “Emergency Preparedness Tables,”<sup>9</sup> LS Power modified the description set forth by Energy Safety, changing the last sentence from “LS Power explained that the tables were incomplete because its substations will not be operational until mid-2024” to “LS Power explained that the tables were incomplete because its substations were not near completion at the time of the initial WMP.”<sup>10</sup>
  - a. In Section 5 of its 2025 WMP Update, LS Power must update the description of area for continued improvement LS Power-23-01 to match that of the description set forth by Energy Safety.
2. LS Power provided inconsistent justifications for updates to its objective completion date and quarterly inspection targets for the same initiative, LSP-02 “Equipment Inspections.” In Section 2.2 *Initiative Objectives* of its 2025 WMP Update, LS Power stated that its first substation operation date has shifted from June 2024 to January 2025.<sup>11</sup> In Section 3 *Quarterly Inspection Targets for 2025* of its 2025 WMP Update, LS Power stated that its energization date for both of its substations has shifted out due to various delays and that changes in energization dates pushed the inspection start date for each site to later than previously expected.<sup>12</sup> The justification provided in Section 2.2 is inconsistent with that provided in Section 3; the former cites delays due to a shift of its “first” substation operation date, while the latter cites “both” substations.
  - a. LS Power must provide consistent justification(s) for updates to objective completion dates and quarterly inspection targets of the same initiative.

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<sup>9</sup> [Energy Safety's Decision on LS Power's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true), p. 54 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56225&shareable=true, accessed August 9, 2024).

<sup>10</sup> [LS Power 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true), pp. 10-18 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true, accessed August 9, 2024).

<sup>11</sup> [LS Power 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true), p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true, accessed August 9, 2024).

<sup>12</sup> [LS Power 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true), p. 8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true, accessed August 9, 2024).

## 4. Revisions to Previously Submitted Data

As noted in Section 2 of this document, updates to 2024 targets are not reportable for the 2025 WMP Update (see Section 2, subpart 1a). LS Power made impermissible edits to these targets in its quarterly data report (QDR) submissions to reflect the non-reportable updates in its 2025 WMP Update. LS Power must submit revisions to its 2024 Q1 and Q2 QDRs, Table 1-15, to remove the non-reportable updates to 2024 targets.<sup>13</sup> LS Power must submit the revised QDRs by the due date identified in Section 5 of this document.

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<sup>13</sup> [Energy Safety Data Guidelines \(v3.2\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56226&shareable=true), pp. 7-8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56226&shareable=true, accessed September 5, 2024).

## 5. Conclusion and Next Steps

LS Power must submit a 2025 WMP Update to Energy Safety's 2023-2025 WMP docket that conforms to Energy Safety's 2025 WMP Update Guidelines and corrects the non-substantive errata listed, pursuant to the schedule below. LS Power's resubmitted 2025 WMP Update will be the subsequent version of its 2025 WMP Update submission and must be named accordingly, e.g., LS Power 2025 WMP Update R1. LS Power must also submit revised 2024 Q1 and Q2 QDRs to Energy Safety's 2024-QDR docket. LS Power's resubmitted QDRs must be named accordingly, e.g., LS Power\_2024\_Q1\_Tables1-15\_R1 and LS Power\_2024\_Q2\_Tables1-15\_R1.

Opening and reply comments on LS Power's resubmitted 2025 WMP Update must be provided in accordance with Energy Safety's 2023-2025 WMP Process and Evaluation Guidelines. For LS Power only (not for other Group 2 electrical corporations), the schedule below supersedes the schedule published by Energy Safety on June 21, 2024.<sup>14</sup>

The schedule for this Rejection and Order to Resubmit is as follows:

LS Power's resubmitted 2025 WMP Update and revised QDRs due:	September 17, 2024
Opening comments due on LS Power 2025 WMP Update:	September 27, 2024
Reply comments due on LS Power 2025 WMP Update:	October 2, 2024
Draft Decision on LS Power 2025 WMP Update issued no later than:	December 31, 2024

LS Power's submission of a 2025 WMP Update that conforms with the submission instructions in Energy Safety's 2025 WMP Update Guidelines does not guarantee the approval of LS Power's 2025 WMP Update.

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<sup>14</sup> [Revised Schedule for Group 1 Electrical Corporation 2025 WMP Updates \(Jun. 21, 2024\)](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56875&shareable=true>, accessed Aug. 27, 2024).

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