

LS Power Grid California 2025 Wildfire Mitigation Plan Update

Revision 1



Submitted by:

LS Power Grid California LLC.

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1. Updates to Risk Models

The electrical corporation must report on updates to its risk models. The collective updates to risk models are categorized as either “significant” or “non-significant.” The electrical corporation must categorize the collective changes to its risk models as either significant updates or non-significant updates, not both. The proceeding subsections outline the thresholds to determine if updates to risk models are “significant” or “non-significant.”

When determining if updates to risk models are “significant” (Section 1.1.1) or “non-significant” (Section 1.1.2), the electrical corporation’s analysis must be independent of risk reduction resulting from deployed mitigations described in the approved 2023-2025 Base WMP. For example, if a circuit was undergrounded in late 2023, the analysis would not take that risk reduction into account and would evaluate the risk for that circuit consistent with the point in time represented by WMP Table 6-5 in the approved 2023-2025 Base WMP.

An electrical corporation must analyze its top 5 percent of highest risk circuits, segments, or spans³ to determine whether updates to its risk models are significant. An electrical corporation’s top ignition risk circuits, segments, or spans are the top 5 percent of highest ignition risk circuits, segments, or spans when the circuits, segments or spans are ranked individually from highest to lowest circuit-mile-weighted ignition risk. An electrical corporation’s top Public Safety Power Shutoff (PSPS) risk circuits, segments or spans are the top 5 percent of highest PSPS risk circuits, segments, or spans when the circuits, segments or spans are ranked individually from highest to lowest circuit-mile-weighted PSPS risk.

1.1 Significant Updates

If an electrical corporation’s updates to its risk models are significant, it must:

- *Discuss its updated methodology and models (e.g., using a new machine learning algorithm, changing how wildfire consequences are calculated, or changes to assumptions);*
- *Provide justification for the updates;*
- *Show how risk has shifted as a result of the updates; and*
- *Report any resulting changes to prioritization of mitigation initiatives and scheduling and workplans for the implementation of mitigation initiatives resulting from these updates.*

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest-risk circuits, segments, or spans.⁵ If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information. Discussions of significant updates to risk models must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

1.1.1 Top Risk-Contributing Circuits, Segments, or Spans

Significant updates to risk models are defined as:

- *Any change or combination of changes to a risk model that moves 10 percent or more of ignition risk into or out of the top ignition risk circuits, segments, or spans,⁶ and/or*
- *Any change or combination of changes to a risk model that moves 10 percent or more of PSPS risk into or out of the top PSPS risk circuits, segments, or spans.⁷*

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest risk circuits, segments, or spans. If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information. Discussions of significant updates to risk models must be limited to 20 pages. Figures and tables are excluded from the 20-page limit.

This section of the 2025 WMP Update is not applicable to LSPG-CA as LSPG-CA did not deploy any updates to its risk models.

1.1.2 Qualitative Updates

Updates to risk models are also considered significant if any of the following qualitative updates are made:

- *Introduction of a new model.*
- *Discontinuation of an existing model.*
- *Any change in existing model application or use-case. For example, newly applying an existing vegetation risk model to PSPS decision-making.*
- *Introduction of new data types. For example, incorporating additional risk drivers into newer versions of a model.*
- *Changes to data sources. For example, using a new source of data to measure vegetation moisture content.*
- *Changes to third-party vendors for risk modeling or inputs to risk modeling.*

Examples of qualitative updates that are not considered significant updates to risk models include, but are not limited to, the following:

- *Updating an existing dataset (e.g., augmenting ignition and outage datasets with 2023 data).*
- *Fixing code errors.*

This section of the 2025 WMP Update is not applicable to LSPG-CA as LSPG-CA did not deploy any updates to its risk models.

1.2 Non-Significant Changes

If an electrical corporation's updates to its risk models do not meet the "significant" criteria of Section 1.1.1, the electrical corporation must provide a tabulated summary of changes in risk ranking of the top 5 percent ignition risk and PSPS risk circuits, segments, or spans.

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest risk circuits, segments, or spans. 8 If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information.

Energy Safety defines a non-significant update as:

- *Any change or combination of changes to the risk model that moves less than 10 percent of ignition risk into or out of the top ignition risk circuits, segments, or spans and less than 10 percent PSPS risk into or out of the top PSPS risk circuits, segments, or spans; or*
- *Any change that only moves ignition and PSPS risk within the top risk segments.*

Since the submission of its 2023-2025 Base WMP, LSPG-CA has not made any changes to its risk model.

2. Changes to Approved Targets, Objectives, and Expenditures

The electrical corporation must report qualifying changes to targets, objectives, and expenditures from its approved 2023-2025 Base WMP. Each change must be justified by lessons learned,⁹ internal policy changes, new laws or regulations, corrective actions resulting from Energy Safety’s compliance process,¹⁰ or other explanations for the change. Thresholds for qualifying changes to targets, objectives, and expenditures are set forth below.

2.1 2025 Targets or Target Completion Dates

For large volume work (equal to or greater than 100 units), the electrical corporation must report changes of 10 percent or greater to a 2025 target from the electrical corporation’s approved 2023-2025 Base WMP.

For small volume work (less than 100 units), the electrical corporation must report changes of 20 percent or greater to a 2025 target from the electrical corporation’s approved 2023-2025 Base WMP.

Following the submission and approval of its 2023-2025 Base WMP, LSPG-CA’s energization date of both substations has shifted out due to permitting and construction delays. The Orchard Substation is expected to be energized in Q1 2025 and the Fern Road Substation in Q4 2025. The changes in energization dates pushed the inspection start date out for each site to later than previously expected for 2025.

Initiative Activity	Tracking ID	Units	2025 Submitted Target	2025 Updated Target	2025 % Change	Meets Requirements	WMP Section
Equipment Inspections	LSP-02	Number of inspections	24	15	25%	Yes	Section 8.1.1.2, Table 8-4; pg. 102
Vegetation Inspection	LSP-04	Number of Inspections	N/A	15	100%	Yes	Section 8.2.1.2, Table 8-14; pg. 120
Integrate StormGeo, a weather forecasting support tool	LSP-05	Percent Integrated	0%	100%	100%	Yes	Section 8.3.1.2, Table 8-23; pg. 133

Install cameras at Orchard/Fern Road	LSP-06	Number of cameras installed	0	32	100%	Yes	Section 8.3.1.2, Table 8-23; pg. 132
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2.2 Initiative Objectives

The electrical corporation must report any changes to forecasted initiative objective completion dates in its approved 2023-2025 Base WMP that shift an objective's completion to a different compliance period.¹¹

The electrical corporation may not add or delete 3- and 10-year objectives set forth in its approved 2023-2025 Base WMPs.

Initiative Activity	Units	Tracking ID	Submitted WMP Completion Date	Updated Expected Completion Date	Justification for Change	WMP Section
Substation Inspection program	Substation Inspection	LSP-02	June 2024	Q1 2025	Due to construction and permitting delays both Orchard and Fern energization dates have been pushed back to 2025.	Section 8.1.1.3, Table 8-1; pg. 101
Vegetation Inspection	Substation Inspection	LSP-04	June 2024	Q1 2025	Due to construction and permitting delays both Orchard and Fern energization dates have been pushed back to 2025.	Section 8.2.1.2, Table 8-14; pg. 121
Integrate StormGeo, a weather forecasting support tool	Integration %	LSP-05	December 2024	Q1 2025	Due to construction and permitting delays both Orchard and Fern energization dates have been pushed back to 2025.	Section 8.3.1.2, Table 8-23; pg. 133
Install Substation Cameras	Cameras Installed	LSP-06	December 2024	Q4 2025	Due to construction and permitting delays both Orchard and Fern energization dates have been pushed back to 2025.	Section 8.3.1.2, Table 8-23; pg. 133

Initiative Activity	Units	Tracking ID	Submitted WMP Completion Date	Updated Expected Completion Date	Justification for Change	WMP Section
Establish contact with local public safety and fire agencies and ensure site locations and access information are integrated into relevant dispatch systems.	Integration occurrence and visit volume	LSP-08 & LSP-09	June 2024	January 2025	This row is two separate initiatives and needs to be updated to reflect that. The energization of LSPG-CA facilities has been delayed with the first becoming operational in January of 2025. Dispatchers will need to be updated with new operational contacts and safety information before energization.	Section 8.4.1.1, Table 8-33; pg. 142

2.3 Expenditures Changes

The electrical corporation must report any changes to 2025 projected expenditures in its approved 2023-2025 Base WMP that result in an increase or decrease of more than \$10 million or constitute a greater than 20 percent change in an initiative’s planned total expenditure in the 2025 compliance period.

LSPG-CA has no expected expenditure changes greater than \$10 million nor any that result in a greater than 20% change in total planned expenditures for 2025.

3. Quarterly Inspection Targets for 2025

The electrical corporation must define quarterly targets (end of Q2 and end of Q3) for 2025 asset and vegetation inspection targets established as end-of-year targets in its approved 2023-2025 Base WMP. The electrical corporation must use the format established by Table 3-1 to report these quarterly targets. Changes to end-of-year 2025 targets must be reported and explained pursuant to Section 2: Changes to Targets, Objectives, and Expenditures, above.

For its redlined and clean 2023-2025 Base WMP, the electrical corporation must add columns for end of Q2 2025 and end of Q3 2025 targets to its asset inspection and vegetation inspection target tables.¹²

Following the submission and approval of its 2023-2025 Base WMP, LSPG-CA's energization date of both substations has shifted out due to permitting and construction delays. The Orchard Substation is expected to be energized in Q1 2025 and the Fern Road Substation in Q4 2025. The changes in energization dates pushed the inspection start date out for each site to later than previously expected for 2025.

Initiative Activity	Tracking ID	Units	Target End of Q2 2025	Target End of Q3 2025	End of Year Target 2025	X% Risk Impact 2025
Implement Inspection	LSP-02	Number of Inspections	6	9	15	0
Vegetation Inspection	LSP-04	Number of Inspections	6	9	15	0

4. New or Discontinued Programs

The electrical corporation must report on the creation of a new program or the discontinuance of a program described in its approved 2023-2025 Base WMP. Each change must be justified by lessons learned,¹³ internal policy changes, new laws or regulations, corrective actions resulting from Energy Safety’s compliance process,¹⁴ or other explanations for the change.

An electrical corporation’s discussion on new or discontinued programs must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

LSPG-CA has one new program identified since the completion of the 2023-2025 Base WMP. Due to updated internal adoption as a standard design practice, all LSPG-CA substations will include dedicated weather stations on site.

Substation weather stations will contribute to the reduction of wildfire risk by enhancing situational awareness. Weather stations will collect and transmit real-time weather conditions, including temperature, humidity, and wind speed, to LSPG-CA’s system operations control center which is staffed 24x7. This data, combined with other methods of situational awareness such as real-time video, will be used to guide operational decision making. LSPG-CA’s operational policies and procedures, including the Emergency Operations Plan, are currently under development.

5. Progress on Areas for Continued Improvement

The electrical corporation must report on progress required by the areas for continued improvement identified in Energy Safety's Decision on the electrical corporation's 2023-2025 WMP.¹⁵ The electrical corporation must provide narrative responses to each required progress that specified reporting in the 2025 WMP Update. This narrative response must include:

- *Code and title of the area for continued improvement,*
- *Description of the area for continued improvement,*
- *Required progress, and*
- *The electrical corporation's response to the required progress.*

The electrical corporation may refer to other sections of its 2025 WMP Update when reporting on areas for continued improvement if there is a duplication of reporting.

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Issue #	Title	Description	Required Progress	Status
LS Power-23-01	Emergency Preparedness Tables	Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.	In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-33 – 3-Year Objectives.	LSPG-CA has completed the table by replacing N/A cells with the appropriate information.
LS Power-23-01	Emergency Preparedness Tables	Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.	In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-34 – 10-Year Objectives.	This table was complete. No changes required.

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<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-35 – Targets.</p>	<p>LSPG-CA updated N/A Target risk impact values to 0 as there is no change in risk</p>
<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024..</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-36 – Performance Metrics.</p>	<p>This table is complete. LSPG-CA was not a California utility until 2023 so N/A values have been left alone.</p>
<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-37 – Key Gaps and Limitations.</p>	<p>This table has been completed and explains that this is LSPG-CA's first emergency plan for CA and will meet all CPUC and NERC requirements</p>

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<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-38 – Staffing and Qualifications.</p>	<p>LSPG-CA has added the appropriate emergency preparedness staff and qualifications</p>
<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024..</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-39 – Training Program.</p>	<p>Added missing corporate personal training program. It is currently unknown how many personnel will be required so this was intentionally left TBD for now.</p>
<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-40 – Contractor Training Program.</p>	<p>Added missing contractor training program. It is currently unknown how many contractors will be engaged so this was intentionally left TBD for now.</p>

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<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-41 – Internal Drills, Simulation, and Tabletop.</p>	<p>Added missing internal drill, simulation, and exercise program information. It is currently unknown how many personnel will participate in training programs so this was intentionally left TBD for now.</p>
<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-42 – External Drills, Simulation and Tabletop.</p>	<p>Added missing external drill, simulation, and exercise program information. It is currently unknown how many personnel will participate in training programs so this was intentionally left TBD for now.</p>
<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-43 – Updates to EP Plan.</p>	<p>Completed the table as much as possible. The emergency preparedness plan under development will be LSPG-CA's first issue of the plan so there are no current updates.</p>

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<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024..</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-44 – State & Local Collaboration.</p>	<p>Completed the table as much as possible. The emergency preparedness plan is under development so most sections of this table are still N/A.</p>
<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024..</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-45 – Key Gaps with Collaboration Agencies.</p>	<p>LSPG-CA added an expected gap/limitation for collaboration activities with state and local agencies.</p>

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<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-46 – High Level Communications.</p>	<p>LSPG-CA has neither customers nor service territory so the table was updated to include communication information for local first responders.</p>
<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-47 – Key Gaps with Communications.</p>	<p>LSPG-CA has added two gaps/limitations in communication with public safety partners.</p>
<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-48 – Mutual Aid Agreement.</p>	<p>This table was complete. No changes required</p>

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<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-49 – Protocols for Communication with Stakeholders.</p>	<p>Table was completed with emergency communication protocols for CAISO and PG&E.</p>
<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-50 – Key Gaps on Communications Strategy.</p>	<p>LSPG-CA has added 1 gap/limitation in it's public emergency communication strategy.</p>

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<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-51 – Internal Drills, Simulation, and Tabletop for Service Restoration.</p>	<p>Internal tabletop exercises for restoration were updated to include the latest information.</p>
<p>LS Power-23-01</p>	<p>Emergency Preparedness Tables</p>	<p>Many of LS Power's emergency preparedness tables were incomplete. LS Power explained that the tables were incomplete because its substations will not be operation until mid-2024.</p>	<p>In its 2025 Update, LS Power must complete all 20 tables in the emergency preparedness section. The information provided in these tables must match the information that LS Power provides in its QDRs. Complete Table 8-52 – External Drills, Simulation, and Tabletop for Service Restoration.</p>	<p>External tabletop exercises for restoration were updated to include the latest information.</p>