



Workshop Slides and Recording

Draft Wildfire Mitigation Plan Guidelines Package 1 Workshop

The Office of Energy Infrastructure Safety held a public workshop for Package 1 materials of the Draft Wildfire Mitigation Plan (WMP) Guidelines on November 26, 2024. A recording of the meeting can be found on Energy Safety's YouTube channel.

Workshop Recording: [Draft WMP Guidelines Workshop](#)

The slides presented during the meeting are attached to this document.

DRAFT WILDFIRE MITIGATION PLAN GUIDELINES PUBLIC WORKSHOP

For Package 1 materials

November 26, 2024



WELCOME & INTRODUCTION

SAFETY MESSAGE



- Be aware of your surroundings
- Know your emergency exits and evacuation route(s)
- Feel something, say something
- Take regular breaks; get up and stretch
- Keep emergency contact information readily available

AGENDA

November 26, 2024 | 10 a.m. – 1 p.m.

10:00 a.m. – 10:15 a.m.	Introduction
10:15 a.m. – 11:15 a.m.	Process and Evaluation Chapter (Plus the Petition to Amend Chapter and Appendices) Presentation by Energy Safety (10:15 a.m. – 10:45 a.m.) Public comments and questions (10:45 a.m. – 11:15 a.m.)
11:15 a.m. – 11:30 a.m.	Break
11:30 a.m. – 12:45 p.m.	Technical Elements Chapter Presentation by Energy Safety (11:30 a.m. – 12:10 p.m.) Public comments and questions (12:10 p.m. – 12:45 p.m.)
12:45 p.m. – 1:00 p.m.	Closing Remarks



WORKSHOP OBJECTIVES



- Present Package 1 of the draft Wildfire Mitigation Plan (WMP) Guidelines that will apply after adoption, beginning with 2026-2028 Base WMP submittals*
- Discuss Energy Safety's objectives and proposed changes for the draft WMP Guidelines
- Provide an opportunity for stakeholder feedback on the draft Guidelines
- Provide an opportunity for stakeholders to ask questions to inform written comments

**Petition to Amend chapter will be effective immediately*

WORKSHOP LOGISTICS



- Verbal comments and questions will be taken at the end of each session
- Please raise your hand on Zoom when you have a question or comment
- Written comments can be entered in the chat window at any time
 - All comments will be recorded and evaluated for consideration
 - Questions will be included in the Public Comments and Questions discussion if time permits
- Please identify yourself prior to speaking
- The workshop will be recorded and posted on Energy Safety's website and relevant docket



Introduction - WMP & Guidelines Background

BACKGROUND (1 OF 2)




- Electrical corporations (ECs) are required to prepare and submit WMPs to Energy Safety, as required by Pub. Util. Code § 8386(b)
- WMPs describe how the EC is constructing, maintaining, and operating its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfires
- Energy Safety has authority under Government Code section 15475.6 to “adopt guidelines setting forth the requirements, format, timing, and any other matters required to exercise its powers, perform its duties, and meet its responsibilities...”

BACKGROUND (2 OF 2)



- Base WMPs are submitted every three years, ECs submit WMP Updates in each interim year
- ECs submitted 2023-2025 Base WMPs in spring of 2023
- Energy Safety evaluated and approved each EC's 2023-2025 Base WMP
- ECs submitted 2025 WMP Updates in March 2024
- Base 2026-2028 WMP submission and evaluation schedule is forthcoming



WMP Guidelines Suite of Documents & Packages

EXISTING VS. PROPOSED WMP GUIDELINES SUITE



EXISTING:

1. 2023 – 2025 WMP Technical Guidelines
2. 2023 – 2025 WMP Process and Evaluation Guidelines
3. 2023 – 2025 WMP Independent Transmission Owner (ITO) Supplement to the Technical Guidelines
4. 2023 – 2025 Electrical Corporation Wildfire Mitigation Maturity Model
5. 2023 Electrical Corporation Wildfire Mitigation Maturity Survey

*PROPOSED:

1. Draft WMP Guidelines
 - Contains:
 - Process & Evaluation Chapter
 - Technical Elements Chapter
 - Petition to Amend Chapter
 - ITO Supplement Chapter
2. Draft Electrical Corporation Wildfire Mitigation Maturity Model and Survey Guidelines

**To be published in two packages*

PACKAGE 1 OVERVIEW

1. Draft WMP Guidelines Document:

- Chapter I – Introduction
- Chapter II – Process and Evaluation
- Chapter III – WMP Technical Requirements
- Chapter IV – Petition to Amend
- Attachment 1– Data Request Log Template
- Appendix A – Definitions
- Appendix B – Supporting Documentation for Risk Methodology and Assessment
- Appendix C – Additional Maps
- Appendix D – Areas for Continued Improvement
- Appendix E – Referenced Regulations, Codes, and Standards



PACKAGE 2 OVERVIEW

1. Draft Electrical Corporation Wildfire Mitigation Maturity Model and Survey Guidelines
2. ITO Supplement Chapter (Chapter V of the Draft WMP Guidelines)
 - *Package 2 publication expected for Mid-December with a separate workshop to follow*





Process and Evaluation Chapter (Plus the Petition to Amend Chapter and Appendices)



WMP-specific process information and requirements:

1. WMP Submission Information
2. General Instructions
 - Requirements for tables, data submission, mapping, and glossary
3. Collaboration
 - New section regarding workshops, working groups, scoping meetings, and other collaborations
4. Evaluation of WMPs
 - Pre-submission check, Revision Notice process, and Energy Safety evaluation criteria
5. Data Request Log
 - Maintained and submitted by ECs weekly during WMP evaluation

PROCESS & EVALUATION CHAPTER – NOTABLE CHANGES (1 OF 3)



- **WMP Data (Section 2.1)**
 - Must submit an Excel file matching the information in each table within the WMP
 - Data related to the WMP will be submitted annually outside of Quarterly Data Reports
 - Targets, projected expenditures, performance metric projections, etc.
- **Mapping Requirements (Section 2.2)**
 - Must include one representative map within the body of the WMP and host geospatial layers on a publicly accessible web address
- **Glossary (Section 2.5)**
 - Must attach a glossary to WMP that lists terms and definitions not already defined in Appendix A
- **Change Order process removed**
- **Petition to Amend process added (Chapter IV)**



- **Pre-Submission Check Process (Section 4.1.1.1)**
 1. Each electrical corporation completes the pre-submission checklist provided by Energy Safety and attaches this checklist/tool to its WMP pre-submission.
 2. Energy Safety confirms the electrical corporation provided a narrative for each section and sub-section in the WMP.
 3. Energy Safety confirms required tables are filled out in the WMP, including tables submitted as an Excel file with the WMP.
 4. Energy Safety informs the electrical corporation if it satisfied the pre-submission check.

PROCESS & EVALUATION CHAPTER – NOTABLE CHANGES (3 OF 3)



- Energy Safety Policy Division Process Guidelines (*forthcoming*)
 - Several processes and documents overlap across the ESPD workstreams
 - WMPs, Safety Culture Assessments, Safety Certifications, Executive Compensation, etc.
 - This new Process Guidelines document will contain items previously in the WMP Process and Evaluation Guidelines:
 - Extension Requests
 - Docket Access
 - Errata
 - Naming Conventions
 - Data Requests
 - Not a part of the WMP Guideline Suite of Documents but being worked on concurrently with Package 2 publications

PETITION TO AMEND CHAPTER



- Allows for amendments to align WMPs with General Ratemaking Case (GRC) Decisions
 - Within 45 days of the relevant GRC decision or any CPUC order modifying that decision
 - Does not allow for amendments unrelated to GRC or non-substantive corrections such as typos
- May be approved in totality or in part by Energy Safety
- Approved amendments must be reflected in subsequent relevant WMP and data submissions

APPENDICES



Same appendices as 2023-2025 Technical Guidelines with minor edits to match section changes:

- Appendix A – Definitions
- Appendix B – Supporting Documentation for Risk Methodology and Assessment
- Appendix C – Additional Maps
- Appendix D – Areas for Continued Improvement
- Appendix E – Referenced Regulations, Codes, and Standards

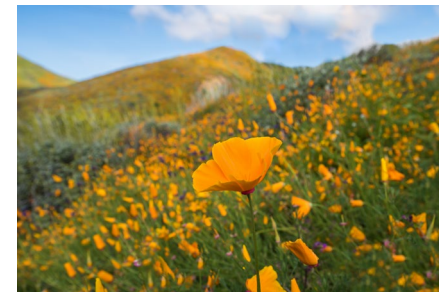


DISCUSSION

HOW TO PARTICIPATE

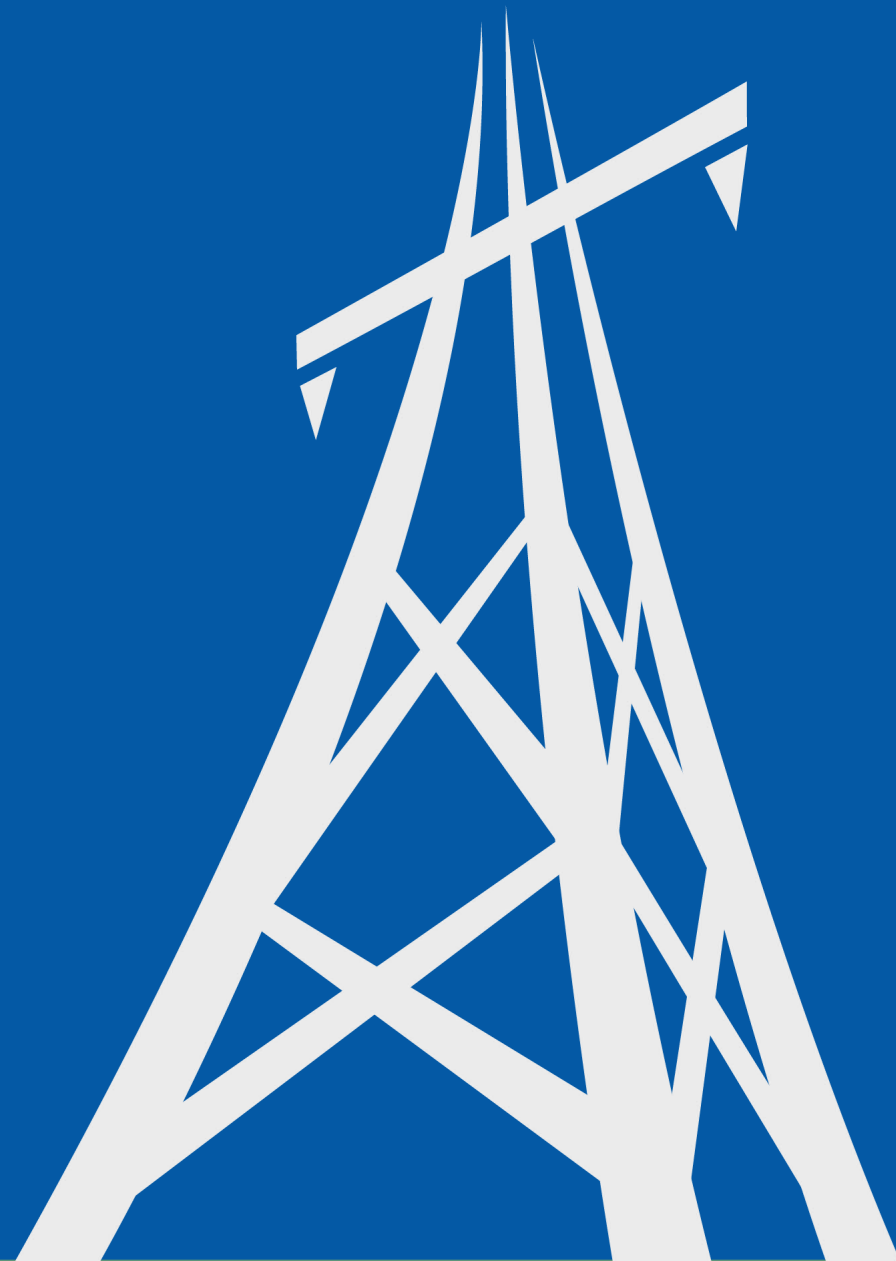
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BREAK

Return at 11:30 am



The background of the slide is a photograph of a rugged, rocky hillside. The upper portion of the image shows a sky with soft, white and grey clouds. The middle and lower portions show a steep slope covered with large, light-colored rocks and patches of green vegetation, including several tall evergreen trees. A dark blue rectangular box is overlaid on the left side of the image, containing the chapter title.

Technical Elements Chapter

TECHNICAL ELEMENTS CHAPTER – SECTION STRUCTURE



1. Executive Summary
2. Responsible Persons
3. Overview of WMP
4. Overview of the Service Territory
5. Risk Methodology and Assessment
6. Wildfire Mitigation Strategy Development
7. Public Safety Power Shutoff (PSPS)
8. Grid Design, Operations, and Maintenance
9. Vegetation Management and Inspections
10. Situational Awareness and Forecasting
11. Emergency Preparedness, Collaboration, and Public Awareness
12. Enterprise Systems
13. Lessons Learned

COMPREHENSIVE CHANGES/UPDATES



- Mitigation Initiative sections broken out into separate sections:
 - Grid Design, Operations, and Maintenance (Section 8)
 - Vegetation Management and Inspections (Section 9)
 - Situational Awareness and Forecasting (Section 10)
 - Emergency Preparation, Collaboration, and Public Awareness (Section 11)
- Changes to Targets
 - ‘Objectives’ now ‘Qualitative Targets’
 - ‘Targets’ now ‘Quantitative Targets’
 - Addition of a Master Target Table in each Mitigation Initiative section
 - No longer requiring 10-year targets; focus on one- and three-year targets within the three-year cycle

SECTIONS 1-3: INTRO SECTIONS



1. Executive Summary

- No more than 10 pages

2. Responsible Persons

- No changes

3. Overview of WMP

- Removed Statutory Requirements Checklist
- Brought in Performance Metrics (Section 3.5) and Climate Change (Section 3.6) as subsections
 - Removed projection requirements for self-identified performance metrics

SECTION 4: OVERVIEW OF SERVICE TERRITORY

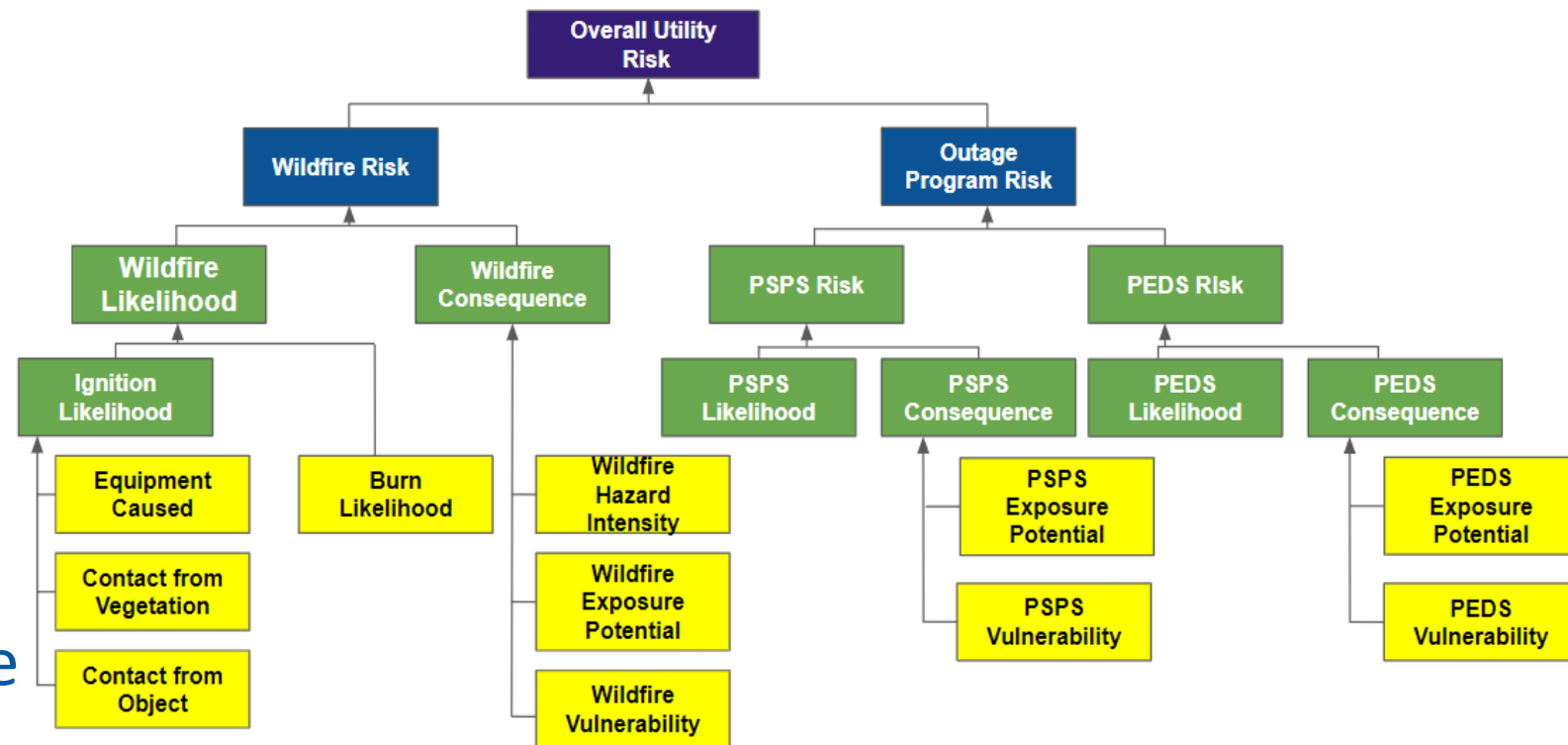


- Simplified into three subsections:
 - Service Territory
 - Area served (sq. miles), # of customers, electrical infrastructure
 - A geospatial representative map
 - Catastrophic Wildfire History
 - A brief narrative summarizing wildfire history (20 years)
 - Statistics of electrical corporation ignited catastrophic fires
 - Frequently De-energized Circuits
 - Note the re-location from the PSPS Section

SECTION 5: RISK METHODOLOGY & ASSESSMENT



- Updated Overall Utility Risk framework and components
- Change from Burn Probability to Burn Likelihood
- Changed Ignition Risk to Wildfire Risk
- Addition of Outage Program Risk
- Addition of Protective Equipment and Device Settings (PEDS) Risk



SECTION 6: WILDFIRE MITIGATION STRATEGY DEVELOPMENT



- Modified tables and examples for clarity throughout
 - Tables demonstrate minimum acceptable levels of information
- Added to Risk Evaluation Process
 - Requires ECs to provide a list that identifies, describes, and prioritizes circuit segments based solely on overall utility risk, including the associated risk drivers
- Updated risk impact calculation
 - For each initiative, ECs must calculate the expected risk reduction of wildfire risk, outage program risk, and combined overall utility risk, including the cost benefit score
- Revised Wildfire Mitigation Strategies
 - Requires ECs to provide the percentage of mitigation work planned to be done within the HFRA

SECTION 7: PUBLIC SAFETY POWER SHUTOFF



- Removed target reporting and other narrative requirements throughout
- Added requirements for ECs to provide:
 - A narrative describing how it will reduce the need for, and impact of, future PSPS implementation on frequently de-energized circuits
 - Lessons learned for PSPS events occurring since the electrical corporation's last WMP submission
 - Mitigation methodology for reducing PSPS events in the future

SECTION 8: GRID DESIGN, OPERATIONS, & MAINTENANCE (1 of 3)



- Grid Design and System Hardening (Section 8.2)
 - Updated requirement that each initiative activity must have distinct, trackable targets
 - EC may *internally* track combined activities
 - Added details regarding impacts of activities on wildfire risk and outage program risk:
 - Including risk reduction calculations, trend analysis, and discussion of the mitigation's impact on both likelihood and consequence
 - Including reliability impact calculations, consideration of hardened status of upstream and downstream spans, and impact on likelihood and consequence

SECTION 8: GRID DESIGN, OPERATIONS, & MAINTENANCE (2 OF 3)



- Asset Inspection (Section 8.3) added:
 - Requirement for percentage of HFRA covered by inspection targets annually
 - Find rate of level 1, 2, and 3 conditions
- Equipment Maintenance and Repair (Section 8.4) revisions to:
 - Condition monitoring
 - Maintenance strategy
 - Replacement/repair condition
 - Remediation timeframe
 - Failure and ignition rates and causes

SECTION 8: GRID DESIGN, OPERATIONS, & MAINTENANCE (3 OF 3)



- Added QA/QC requirements (Section 8.5):
 - QA and QC program objectives
 - Sampling methodology
 - Pass rate calculation
 - Other metrics that evaluate the effectiveness of asset QA/QC (in addition to pass/fail rate)
- Grid Ops and Procedures Equipment Settings (Section 8.7) now includes:
 - Percentage of time protective equipment device settings were enabled
 - Tabular data for the top ten most impacted circuits
 - Risk reduction effectiveness calculations
 - Number of ignitions that occurred while settings active

SECTION 9: VEGETATION MANAGEMENT & INSPECTIONS



- Updated quantitative/qualitative target requirements for specified initiatives
- Modified initiative structure
 - Clearance, Fall-in Mitigation, and High-Risk Species rolled into Inspections
 - Pruning and Removal activities given separate subsection
 - Fire-Resilient Rights of Way is now Integrated Vegetation Management
- Added QA/QC subsection requirements
 - QA and QC program objectives
 - Sampling methodology
 - Pass rate calculation
 - Other metrics that evaluate the effectiveness of VM (in addition to pass/fail rate)

SECTION 10: SITUATIONAL AWARENESS



- Added requirement for **both** qualitative **and** quantitative targets for each initiative listed
- Incorporated recurring Area for Continued Improvement into its own subsection: *Weather Station Maintenance and Calibration*
 - Note: specific targets are required for this subsection

SECTION 11: EMERGENCY PREPAREDNESS, COLLABORATION, & PUBLIC AWARENESS



- Consolidated the Emergency Preparedness and Community Outreach sections into one section
 - Reduced overlap and redundant information
- Added focus on Tribal outreach and interaction
- Updated to require at least one qualitative target for each initiative – no quantitative
- Requested information that is already reported in another section of the WMP, can now be provided as a cross-reference with a hyperlink to that section

SECTION 12: ENTERPRISE SYSTEMS



- Enterprise Systems now a standalone section
- Must provide at least one qualitative and quantitative target for each initiative
- Must provide a summary narrative that discusses topics such as:
 - Data storage and governance
 - Internal data updating procedures
 - Asset identification processes
 - Data integrity, accessibility, and retention
 - QA/QC of data and system(s)
 - Employee/contractor ability to access and interact with data and systems

SECTION 13: LESSONS LEARNED



- Requiring narrative with lessons learned tied to feedback from:
 - Government agencies
 - Stakeholders
 - Collaboration efforts with other electrical corporations
 - Areas for continued improvement
 - Outcomes from previous WMP cycles
 - Prior catastrophic wildfires ignited by the electrical corporation's facilities or equipment
 - Findings from Energy Safety compliance audits and reports
- Must report working group meetings attended
- Must report any discontinued initiative activities from previous WMPs

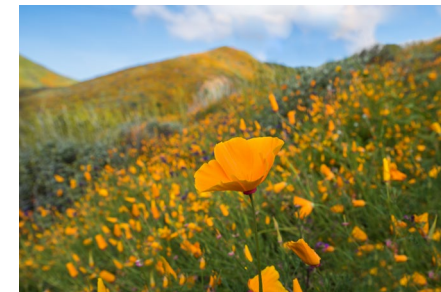


DISCUSSION

HOW TO PARTICIPATE

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Upcoming Dates & Public Participation

UPCOMING DATES & PUBLIC PARTICIPATION (1 of 2)



- Opening Comments for Package 1 are due December 6, 2024, and Reply Comments are due December 12, 2024
- Package 2 documents expected to be published Mid-December
- WMP Submission and Evaluation Schedule is forthcoming

UPCOMING DATES & PUBLIC PARTICIPATION (2 of 2)



- Docket WMP-Guidelines is your primary source of information regarding WMP evaluations:
<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=WMP-Guidelines>
- If substantive changes are made to these draft documents, there will be a second draft of these Guidelines published and an additional comment period prior to adoption of the new WMP Guidelines



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