



OFFICE OF ENERGY INFRASTRUCTURE SAFETY  
**WILDFIRE SAFETY ADVISORY BOARD**  
DRAFT LIST OF POTENTIAL  
WORKSTREAMS

MARCH 2025

# 1. POTENTIAL WORKSTREAMS

Staff last presented a work plan to the Wildfire Safety Advisory Board (WSAB or the Board) at its September 4, 2024 meeting. Staff developed this list of workstreams to invite Board discussion and direction, and will create a work plan based on that feedback. Staff asked Board members for their input on potential topics to investigate. Staff also asked Energy Safety for any requests for “advice and recommendations related to wildfire safety.” (Public Utilities Code (PUC) section 326.2 (d)). Staff reviewed the collected topics, developed draft workstreams to cover the topics, and sought input on each draft workstream from WSAB committees and Energy Safety staff.

## 1.1 Advisory Opinions on Publicly Owned Utilities’ and Rural Electrical Cooperatives’ Wildfire Mitigation Plans

PUC section 8387(b)(1) requires, in part, that “[a]fter January 1, 2020, a local publicly owned electric utility or electrical cooperative shall prepare a wildfire mitigation plan annually and shall submit the plan to the California Wildfire Safety Advisory Board on or before July 1 of that calendar year.” PUC section 326.2(c) requires WSAB to “[r]eview and provide comments and advisory opinions to each local publicly owned electric utility and electrical cooperative regarding the content and sufficiency of its wildfire mitigation plan and recommendations on how to mitigate wildfire risk.” This workstream describes the approach, and staff support, for WSAB to meet this statutory requirement.

### 1.1.1 Approach

This workstream will build upon the success of the previous discussions with publicly owned utility (POU) and electrical cooperative representatives. The WSAB-POU Working Group met January through April 2024 and again from September 2024 through January 2025. The WSAB-POU Working Group will resume meeting monthly starting in April 2025. Staff will draft one or more Advisory Opinion documents by the end of 2025, incorporating information exchanged during the WSAB-POU Working Group meetings. Staff will publish a draft of any Advisory Opinion for public comment before presenting the draft for WSAB consideration.

Depending on staff resources and Board direction, review of the POU wildfire mitigation plans (WMPs) could be more targeted than in previous years, either by choosing particular topics/sections and reviewing those more closely in all the submitted WMPs; or by selecting a smaller number of POU WMPs to review in greater depth.

### 1.1.2 Products and Outcomes

Staff will produce one or more draft Advisory Opinion documents for public comment, and a revised draft or drafts for WSAB consideration at a public meeting. Staff will work with the

appropriate Board committee and POU representatives to convene at least six meetings to discuss topics of interest, and produce a draft report summarizing those meetings.

## 1.2 Recommendations to Energy Safety

PUC section 8389(b) states that, “[b]y June 30, 2020, and annually thereafter, the board shall make recommendations to [Energy Safety] on all of the following:

- 1) Appropriate performance metrics and processes for determining an electrical corporation’s compliance with its approved wildfire mitigation plan.
- 2) Appropriate requirements in addition to the requirements set forth in Section 8386 for the wildfire mitigation plan.
- 3) The appropriate scope and process for assessing the safety culture of an electrical corporation.”

PUC section 326.2 states that, “[t]he California Wildfire Safety Advisory Board shall do all of the following:

- a) Develop and make recommendations to [Energy Safety] related to wildfire safety and mitigation performance metrics.
- b) Develop and make recommendations related to the contents of wildfire mitigation plans pursuant to Chapter 6 (commencing with Section 8385) of Division 4.1.
- c) Review and provide comments and advisory opinions to each local publicly owned electric utility and electrical cooperative regarding the content and sufficiency of its wildfire mitigation plan and recommendations on how to mitigate wildfire risk.
- d) Provide other advice and recommendations related to wildfire safety as requested by [Energy Safety].”

WSAB has historically met its legal obligations under PUC section 8389 by annually adopting a report that includes recommendations to Energy Safety on the three topics listed there (sometimes informally referred to as investor-owned utilities (IOU) Recommendations or the 8389 Report). WSAB has met the requirements of PUC section 326.2 through a combination of actions including: recommendations in the Recommendation to Energy Safety report, where they also satisfy section 326(a) and (b); annual Advisory Opinions to the POUs; and Policy Papers.<sup>1</sup>

This workstream describes the approach and staff support for WSAB to meet the statutory requirements of PUC sections 8389 and 326(a) and (b).

### 1.2.1 Approach

Staff will build on previous WSAB work to develop the annual recommendations to Energy Safety. Staff will review IOU WMPs, and Energy Safety’s WMP Guidelines, the Wildfire Mitigation Plan Compliance Process, Safety Culture Assessment Guidelines, and previous recommendations from WSAB. Staff will identify particular areas in which to make

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<sup>1</sup> [WSAB Adopts Policy Paper Recommendations | Office of Energy Infrastructure Safety \(ca.gov\)](https://www.energy.ca.gov/2019/01/01/wildfire-safety-advisory-board-recommends-policy-papers)

recommendations based on the workstreams below, guidance from appropriate Board committees and WSAB members, and staff observations. Staff will develop specific recommendations and draft a report for the WSAB's consideration at a public meeting. Staff will also work with other Energy Safety staff members to share knowledge and observations, and to refine and target recommendations.

## 1.2.2 Products and Outcomes

Staff will produce a draft IOU Recommendations document for public comment, and a revised draft for WSAB consideration at a public meeting before June 30, 2025.

## 1.3 Risk Modeling

As required by the WMP Technical Guidelines published by Energy Safety, electrical corporations must present certain information on their risk modeling. Staff is developing draft recommendations on the WMP requirements for risk modeling for Board consideration at its June 2025 meeting. There are potential extensions of this work that would build on the staff time invested in understanding utility risk modeling and provide timely input into Energy Safety's processes, including the Risk Model Working Group.

### 1.3.1 Approach

Under the guidance of the appropriate Board committee, staff will continue to study the risk modeling information contained in the IOU WMPs, including submissions of the 2026-2028 Base WMPs. Staff will discuss with other Energy Safety staff, participate in Energy Safety's Risk Modeling Working Group, hold one-on-one meetings with IOU expert representatives, and interview academic experts. Staff may also engage POUs on current practices in risk modeling.

### 1.3.2 Products and Outcomes

Staff will write a section of an annual IOU Recommendations report detailing findings and proposing recommendations to Energy Safety for WSAB consideration.

## 1.4 Safety Culture Assessment

PUC section 8389(d)(4) requires Energy Safety to assess utility wildfire safety culture annually. PUC section 8386.2 states that the CPUC must require third-party evaluations of safety culture at least every 5 years. In January 2025, the CPUC adopted a decision<sup>2</sup> describing its Safety Culture Assessment Framework. The decision noted that CPUC "strives to achieve regulatory alignment and continuity with Energy Safety" and encouraged a coordination plan

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<sup>2</sup> California Public Utilities Commission, "Decision Adopting Safety Culture Assessment Framework for the Large Investor-Owned Utilities," <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M555/K500/555500176.PDF>, accessed February 28, 2025.

between Commission staff and Energy Safety. It also created a Utility Safety Culture Working Group consisting of “the Safety Policy Division, Energy Safety, the Joint IOUs, and other interested entities.”

Energy Safety currently uses surveys to assess safety culture.<sup>3</sup> These surveys are quantitative and relatively straightforward to administer; however, they are also subjective and based on a particular point-in-time. These surveys can reflect an employee’s or contractor’s temporary opinion, or an opinion about other aspects of employment unrelated to safety culture.

One important part of safety culture is the belief that reporting and learning from “near-misses” is encouraged and rewarded, or at least not penalized. The current safety culture assessment guidelines contain assessments of reporting culture including: “Leaders use mistakes and incidents as learning opportunities,” and “People report mistakes they make, even if others do not notice them.” Energy Safety has pointed to areas of improvement for utilities, e.g., “SDG&E should continue to build on its efforts to track trends in safety event-related reporting, specifically tracking the quality of near-miss investigations and continuing to improve its Ignition Management Program,”<sup>4</sup> “PG&E should optimize its safety-enabling systems to improve the quality of event investigations and improve the hazard and near-miss reporting process to align expectations on what to report and when to report. PG&E should also continue to take steps to increase workers’ psychological safety, building confidence in their speak-up and stop-the-job authority”<sup>5</sup> and “SCE .... should also take steps to increase workers’ psychological safety to improve the quantity and quality of safety event (near-miss and hazard) reports.”<sup>6</sup>

The CPUC decision also states that “Safety Policy Division, in collaboration with the Utility Safety Culture Working Group and other interested entities, should evaluate different models of nonpunitive reporting for the Commission...”

Board members remain concerned about this area of safety culture and would like to explore it further with the goal of making recommendations to Energy Safety on its safety culture assessment to further strengthen this area.

### 1.4.1 Approach

Staff will review past Safety Culture Assessment Guidelines and Safety Culture Assessments, and research best practices (policies and technology) in “near-miss” reporting and information sharing, such as the Aviation Safety and Reporting System and Aviation Safety

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<sup>3</sup> [Safety Culture Assessments | Office of Energy Infrastructure Safety](#)

<sup>4</sup> <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56373&shareable=true>

<sup>5</sup> <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56371&shareable=true>

<sup>6</sup> <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56372&shareable=true>

Information Analysis and Sharing System. Staff will participate in the Utility Safety Culture Working Group and collect information on current and future plans for “nonpunitive reporting.”

### **1.4.2 Products and Outcomes**

Staff will develop draft recommendations to Energy Safety for Board consideration and include these in a future Recommendations document.

## **1.5 Catalog and Review of Past Recommendations and Their Effectiveness**

WSAB has made many recommendations since its inception, providing advice to the CPUC, Energy Safety, and the POUs and rural electrical cooperatives. CPUC and Energy Safety have both provided responses to WSAB saying to what extent they would incorporate the Board’s recommendations. POUs and cooperatives have also responded, sometimes in subsequent versions of their WMPs.

Since its inception the Board has had seven Senior Advisors. Unfortunately, staff turnover has depleted the institutional knowledge needed to build on Board recommendations without unnecessary duplication.

In this workstream, staff will develop a catalog of past Board recommendations and their outcomes.

### **1.5.1 Approach**

Staff will review all final recommendations documents adopted by the Board. Staff will collect all Board recommendations in a spreadsheet or database program. Staff will include, for each recommendation, the source and year, category of the recommendation, organization to whom the recommendation was made, the organization’s written response (if any), and a staff analysis of the subsequent products from the recipient organization to see how the recommendation was interpreted and incorporated.

### **1.5.2 Products and Outcomes**

The catalog, described above, is the main product to be prepared by staff. Both the process and the historical catalog would build a body of knowledge that will be helpful to current and future Board members and Board staff. Staff will also analyze categories where the Board has made repeated recommendations, and where those have been most effective. This will inform future recommendations and work plans for the Board.

## **1.6 Site Visits**

Nuances and subtleties of real-world decisions made, and challenges encountered, by contractors, employees, and managers, can only be understood through on-the-ground

experience. In addition, in-person, formal and informal communication with planners allows for invaluable exchanges of information and perspective. Therefore, site visits by WSAB members and staff are irreplaceable. Further, public meetings in parts of the state most impacted by wildfire risk have been among the best attended and have given many Californians access to WSAB they would not otherwise have.

### **1.6.1 Approach**

Staff will work under the guidance of committees and individual Board Members to identify opportunities for site visits. Staff will focus on site visits that support needs in the other workstreams identified in this Implementation Plan. Staff will coordinate site hosts, expert presenters, logistics, and outreach to local populations to participate in public meeting sessions.

### **1.6.2 Products and Outcomes**

Staff will produce a summary report of site visits. Outcomes will include outreach and public meetings in representative parts of the State.

## **1.7 Administration and Supervision**

Work planning must acknowledge the staff resources required for basic operations, including Board and Committee meeting logistics and agenda development; hiring and onboarding; performance evaluation and professional development; supervision and coordination; project planning and tracking; and the rest.

### **1.7.1 Approach**

The WSAB supervisor is responsible for managing staff, including project planning, setting assignments, tracking work quality and quantity, providing feedback, hiring, and coordination. The WSAB staff is a branch within Energy Safety. Energy Safety management is responsible for overseeing the work of the WSAB supervisor and will consult with the Executive Committee.

### **1.7.2 Products and Outcomes**

The outcomes of efforts in this workstream support the success of other workstreams and the priorities identified in the Strategic Plan.

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