

**LS Power Grid California LLC  
ANNUAL REPORT ON COMPLIANCE FOR 2024**

for Submittal to:

**CALIFORNIA OFFICE OF ENERGY  
INFRASTRUCTURE SAFETY**  
California Natural Resources Agency  
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**March 2025**

**Instructions:**<sup>1</sup> *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.<sup>7</sup> 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 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. 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 objectives listed in the tables in Section 8 of its WMP, including all subsections, with completion dates 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 objectives listed in the tables in Section 8 of its WMP, including all subsections, with completion dates within the most recently completed compliance period. Each stated objective must be discussed individually and, at a minimum, include the following information:*
  - 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” 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 targets 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. 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.*
  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" 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, 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 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.*

LS Power Grid California, LLC (LSPGC) is a wholly owned subsidiary of LS Power, and a California Electrical Corporation classified as an Independent Transmission Operator (ITO) by Energy Safety. LSPGC has no transmission lines or distribution facilities planned or in operation during the current Wildfire Mitigation Plan (WMP) cycle. LSPGC had two 500 kilovolt (kV) substation facilities (Fern Road and Orchard) under construction in 2024, with Orchard entering into service in Q1 2025 and Fern Road anticipated to be in-service by Q1 2026. The Fern Road Substation site is located in eastern Shasta County on the western slope of the Sierra Nevada foothills, east of Redding, Shasta County, California. The Fern Road Substation site and most of the project area is categorized as a California Department of Forestry and Fire Protection (CAL FIRE) State Resource Area (SRA) High and Very High Fire Hazard Severity Zones (FHSZs), dominated by hardwood forests/woodland. The Orchard Substation site is located on the valley floor of the Central Valley of California in western Fresno County, approximately 13 miles east of the town of Coalinga, 13 miles north of Kettleman City, and 2 miles east of I-5. The substation site and most of the project area is categorized as a CAL FIRE Local Resource Area (LRA) FHSZ of non-wildland/non-urban, dominated by irrigated agricultural land.

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<sup>1</sup> Text in blue italics are instructions from the Wildfire Safety Division

Note: Due to having no baseline risk values and no insightful way to calculate risk reduction performed by initiatives, no values were included in the 2023-2025 Wildfire mitigation plan and therefore left out of this report as well.

1. LS Power Grid California’s three-year objectives for its 2023-2025 Wildfire Mitigation Plan for its various areas of focus are as follows:
  - a. LSPGC’s 3-year and 10-year objective for grid design, operations, and maintenance is to enhance work safety procedures in areas identified as High Fire Threat Districts (HFTD) and High Fire Risk Areas (HFRAs) and safely transition from construction to operation at both substation facilities. These three-year objectives can be found in section 8.1.1.1 and on pages 102 and 103 of LS Power’s 2023-2025 Wildfire Mitigation Plan. To achieve these objectives the following initiatives were developed:
    - i. To enhance work safety within fire risk areas the LSP-01 initiative to Implement Hot Work Programs during construction and maintenance activities was developed. Hot work Programs have been implemented at both substation sites and are being followed by construction personnel to reduce the risk of wildfires. As neither site was in operation in 2024, the transition from construction to operations did not occur during the compliance period but Hot Work Programs were applied during applicable construction activities.
      1. The method to verify that this task was complete was an updated Worker Environmental Awareness Program (WEAP). In LS Power’s WEAP, Hot Work Programs are listed as required and must meet various minimum requirements to enhance safety. WEAP training is required and logged for all personnel at each site.
      2. There were no targets identified in 2024 for this initiative.
    - ii. The second stated 3-year objective is to safely transition from construction to operations. The Orchard and Fern Road Substations were, at the time of the drafting of the 2023-2025 WMP, scheduled to become operational in 2024, but due to construction and permitting delays both substations remained in construction during the compliance period. This change was reflected in LSPGC’s approved 2025 WMP Update. As such, initiative LSP-02, to implement the substation inspection program, was not achievable due to having no assets energized in 2024. LSP-02 is currently on track to begin in 2025 as reflected in the 2025 WMP Update.
      1. Once in effect, substation inspection reports will be used to verify the completion of this initiative.
      2. In LSPGC’s original 2023-2025 WMP, there were six (6) target substation inspections for the year 2024 based on the anticipated energization of Orchard Substation in mid-2024. As reflected in LSPGC’s 2025 WMP Update, these targets were adjusted due to project delays and no operational inspection program was able to be implemented in 2024.
    - iii. The 10-year objective is to incorporate an enterprise asset management system into maintenance the LSPGC maintenance program to ensure system reliability and public safety. This will be supported by initiative LSP-03 to enhance the use of a Computer Maintenance System Management

Systems (CMMS) into LSPGC maintenance work orders.

1. Once asset data has been imported into the CMMS it can be audited/exported to prove full asset inclusion.
  2. There were no targets for this objective in 2024 and LSPGC is making progress towards including initial substation assets in CMMS in 2025 as targeted in the WMP.
- b. LSPGC's 3- year and 10-year objective for vegetation management and inspections is to establish and maintain a substation vegetation management program to reduce the risk of vegetation contact and potential wildfire spread. This objective can be found in section 8.2.1.1 on pages 120 and 121 of LS Power's 2023-2025 Wildfire Mitigation Plan. To achieve this objective the following initiatives were developed:
- i. LSP-04 - Establish risk-based buffer zones and implement monthly substation inspection program once operational. This initiative is partially completed and can be fully completed once LSPGC becomes operational as stated on page 120 of LS Power's 2023-2025 Wildfire Mitigation Plan. During the compliance period, a buffer zone was established at the Orchard Substation site and two vegetation management actions were taken to maintain the substation defensible space at Orchard once construction at the site had advanced enough to make it feasible to do so.
    1. Once operational, inspection reports and maintenance records will be used to verify the establishment of and adherence to the vegetation management program.
    2. The completion date and targets stated in the WMP are contingent upon the assets being energized. The assets were ultimately not energized in 2024 due to delays so there were no targets identified in 2024 for this initiative. Aside from the operational vegetation management inspections, two separate vegetation clearing efforts were undertaken in 2024 to maintain the proper defensible space around Orchard Substation.
- c. LSPGC's 3-year objective for situational awareness and forecasting is to establish and maintain an environmental monitoring and weather forecasting program that informs measures to reduce the risk of wildfires from environmental or weather-related conditions. This objective can be found in section 8.3.1.1 and on pages 132 and 133 of LS Power's 2023-2025 Wildfire Mitigation Plan with a target completion date of December 2024. The following initiatives were developed to accomplish this objective:
- i. Initiative LSP-05 is to integrate StormGeo, a weather forecasting support tool, into operational practices. Utilizing this technology will better allow LSPGC to monitor weather and adjust to ambient conditions to ultimately reduce risks. This integration was completed in December of 2024. StormGeo weather monitoring was utilized during the compliance period to support construction and commissioning activities and will ultimately be integrated into transmission operations. In addition, a weather station was installed at the Orchard Substation during the compliance period as detailed in LSPGC's 2025 WMP Update to enhance situational awareness.
    1. Updated work procedures outlining StormGeo use in operations will be used to verify completion.
    2. The target for 2024 of integration of StormGeo was achieved.

- ii. Initiative LSP-06 is to install substation cameras with a completion date of December 2024. The Orchard Substation cameras were installed in 2024. Due to permitting and construction delays the Fern Road cameras are now expected to be installed in 2025.
  - 1. Site as-built documentation will be used to verify the installation of these cameras.
  - 2. The 29 targeted cameras for Orchard were installed in 2024 for this initiative. The remaining Fern Road cameras that were originally targeted for 2024 are now anticipated to be installed in 2025 as detailed in LSPGC's 2025 WMP Update.
- d. LSPGC's 3-year objectives for emergency preparedness are to establish relationships with local public safety and fire agencies to ensure site location and access information are integrated into relevant dispatch systems. Integration with local public safety agencies was accomplished in 2024. Site specific safety plans have also been developed and implemented by LSPGC and its contractors to establish fire safe practices during construction. These objectives can be found in section 8.4.1.1 and on pages 142 and 143 of LSPGC's 2025 Wildfire Mitigation Plan. The following initiatives were developed to accomplish the emergency preparedness objectives:
  - i. Initiative LSP-08 was to integrate into local dispatch systems by June 2024. Local public safety officials at both substation areas were contacted and site-specific information has been provided to CalFire. Efforts were made to verify that the substation site locations are accurately captured in the local dispatch systems and the initiative is completed.
    - 1. This initiative will be tracked by saving records of communication.
    - 2. There are no WMP targets associated with this initiative besides the objective completion date of June 2024.
  - ii. Initiative LSP-09 was to establish relationships with local fire agencies. This initiative has been completed by exceeding the target visits for local agencies between the two substation locations in 2024. Various communications related to LSP-09 have taken place and working relationships with the local fire agencies have been established.
    - 1. The method of verifying the completion of this task is records of meetings with local agencies.
    - 2. The 2024 target for this initiative was two meetings with local fire agencies, which was met and surpassed. We exceeded that and had 6 documented meetings with local fire agencies. Also, a site visit was conducted by the Cal Fire Station 93 in the summer of 2024.
- e. LSPGC's 3-year objective for community outreach and engagement was to establish and maintain relationships with local agencies and officials by June 2024. This objective can be found in section 8.5.1.1 on pages 175 and 176 of LS Power's 2024 Wildfire Mitigation Plan. The initiative listed below was developed and implemented to accomplish this objective.
  - i. Because LSPGC is a transmission-only utility with no electric customers, Initiative LSP-09 is also supporting this objective. This initiative has been completed by exceeding the target visits for local agencies in 2024. Various communications related to LSP-09 have taken place and working relationships with the local fire agencies have been established.

2. LS Power requested no change orders during the 2024 compliance period.
3. 2024 planned and actual spend for Wildfire Mitigation initiatives.

**Table 1 – Summary of WMP Initiatives and Expenditures (\$ Thousands)**

<b>Initiative ID</b>	<b>Initiative Name</b>	<b>Planned Spend</b>	<b>Actual Spend</b>	<b>Variance Explanation</b>
LSP-01	Implement Hot Work Programs during construction and maintenance activities	0	0	
LSP-02	Implement Substation Inspection Program	0	0	
LSP-03	Enhance use of Computer Maintenance Management Systems (CMMS)/automation into LSPGC maintenance work orders	0	0	
LSP-04	Establish risk-based buffer zones and implement monthly substation inspection program once operational	0	6.125	Some vegetation management activities were required such as weed clearing.
LSP-05	Integrate StormGeo into decision-making and safety practices	10	2.5	The actual cost was lower than initial projected costs.
LSP-06	Implement 24/7 video security surveillance at substation locations	0	0	
LSP-07	Evaluate and enhance use of live video	0	0	
LSP-08	Establish and ensure integration into Local Public Safety Computer dispatch systems	20	2.416	This required less resources than originally forecasted.
LSP-09	Work to build relationships with local fire agencies and conduct annual visits	0	0	
LSP-10	Establish continuous improvement of	0	0	0



	emergency plan and procedures			
LSP-11	Formalize mechanisms to share lessons learned among ITO peers	20	3.522	This initiative, with completion target of 2029, is now underway. The initial \$3.5k spend reflects the early efforts during the compliance period.