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VIA ELECTRONIC FILING

Docket # Compliance Guidelines

Patrick Doherty
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Bear Valley Electric Service, Inc., Liberty Utilities, Pacific Gas and Electric, PacifiCorp, San Diego Gas & Electric and Southern California Edison Company's Comments on Draft Compliance Guidelines 2025 Update

Dear Mr. Doherty:

Bear Valley Electric Service, Inc., Liberty Utilities (CalPeco Electric) LLC, Pacific Gas and Electric Company, PacifiCorp, San Diego Gas & Electric, and Southern California Edison, ("the Joint Utilities") hereby provide comments addressing the Draft Compliance Guidelines 2025 Update ("Draft Compliance Guidelines") issued by the Office of Energy Infrastructure Safety ("Energy Safety") on June 11, 2025 related to Electrical Corporations' ("ECs") implementation of their Wildfire Mitigation Plans ("WMP"). Section 5 of the Draft Compliance Guidelines requires ECs to submit specific information in order to allow for Energy Safety's effective inspection of work executed in each EC's WMP in addition to the established Quarterly Data Report ("QDR") requirements, and Section 6 requires ECs to submit an Annual Report on Compliance related to the WMP. The Joint Utilities generally support the adoption of the 2025 Draft Compliance Guidelines.

However, the Joint Utilities believe that ongoing collaboration with Energy Safety's divisions would benefit all parties. In particular, collaborating with the Compliance Assurance Division ("CAD"), Policy Division, and Data Division would assist the utilities in understanding the goal of each division and how various guidelines may serve a purpose for these goals. Specifically related to the Draft Compliance Guidelines, the Joint Utilities found instances where the Wildfire Mitigation Plan Guidelines "WMP Guidelines") published February 2025 or Data Guidelines v4.01 ("Data Guidelines") introduce duplicative, redundant, or conflicting requirements, as discussed below. To ensure clarity and consistency of application and promote an effective and consistent

compliance process, the Joint Utilities propose the following modifications and recommendations.

I. COMMENTS

- A. Data requirements presented in *Section 5.0 Executed Work Information Requirements* are unreasonable, overly burdensome, and lack clarity. The Joint Utilities ask Energy Safety to consolidate all reporting requirements into Energy Safety's Data Guidelines.**

Section 5.0 Executed Work Information Requirements states that the Draft Compliance Guidelines supersede the Data Guidelines in cases of conflict, and the Joint Utilities have identified several instances where the two sets of guidelines appear to be in conflict. For example, the Data Guidelines specify that the "Description of Work" field is optional, while the Draft Compliance Guidelines imply that it is mandatory.

Given that the Data Guidelines are reviewed and updated annually and are cited as a dynamic, evolving resource to support compliance-related activities, the Joint Utilities suggest removing all spatial data reporting requirements such as "Description of Work" from the Draft Compliance Guidelines. This would resolve current and future discrepancies between the Draft Compliance Guidelines and the Data Guidelines and ensure one source of truth for reporting requirements. Additionally, it would alleviate the administrative burden placed on the Joint Utilities, which rely on input from over 500 subject matter experts across the organizations to develop and submit quarterly reports. Removing these requirements from the Draft Compliance Guidelines would avoid contradictory instructions, support sound data governance principles, and enable the Joint Utilities and other stakeholders to comply with Energy Safety's expectations in a more streamlined and effective manner.

Sections 5.2 Electrical Undergrounding Information, 5.3 Field Record and Completion Information, and 5.4 Hybrid Work Information ask for additional information to be reported either as part of QDRs or in a separate, concurrent filing. This approach unnecessarily creates two reporting mechanisms to the same entity, Energy Safety. It is the Joint Utilities' understanding that the Data Guidelines ultimately guide both spatial and non-spatial reporting to reflect the implementation of WMPs; therefore, requiring separate, additional reporting outside of the adopted data schema under the Data Guidelines, which could potentially cause data integrity issues, is unreasonable. The Joint Utilities request that CAD collaborate with the Data Division to devise a data schema that will ultimately meet the needs of both divisions. Further, the Joint Utilities welcome a collaborative partnership with Energy Safety's divisions to jointly create a data schema that will serve multiple purposes. The Joint Utilities understand the CAD's need for additional information to support field verification of work performed for WMPs; however, the Joint Utilities believe this can be accomplished by other means discussed herein.

Section 5.2 Electrical Undergrounding Information specifically asks for a geodatabase submission, separate from the QDR, comprised of a point feature class that identifies various assets that are “related to work on an electrical undergrounding project.”¹ This section introduces a new and distinct quarterly reporting requirement that is not included in Energy Safety’s existing Data Guidelines and that would pose challenges and inconsistencies to the Joint Utilities. In addition, the section overlaps with other guidance documents (Electrical Underground Plan (“EUP”) Guidelines and Data Guidelines). To promote effective data governance, the Joint Utilities strongly recommend that Energy Safety ensure consistency across its regulatory frameworks. Introducing multiple, overlapping guidelines, the EUP Guidelines, the Data Guidelines, and now the Draft Compliance Guidelines for data reporting—creates confusion for data providers and increases the risk of conflicting requirements. A single, authoritative source of data requirements would significantly improve efficiency, accuracy, and compliance.

The geodatabase filing requirement does not specify in which cases the additional assets must be reported. It is unclear whether the requested asset details are intended to reflect the state of the infrastructure before or after mitigation. In addition, because the digitization of assets in Geographic Information System (“GIS”) can take many months to perform, it is not feasible to provide point data within the given QDR submission timeframe of one month. Energized assets are digitized in GIS when full projects are completed, and corresponding as-built documentation is reconciled, which could take many months post construction completion.

The dependency on full project completion is yet another factor in the timing of asset digitization. It is common practice for the utilities to report *partial* project completions (i.e., energized miles that are part of a bigger project), which means the as-built documentation for an entire project would not be consistently available for processing. The Joint Utilities also note that the primary distribution layer in the QDR submission contains a current view of all digitized assets, and new/removed/modified assets will be updated when they are made available. Implementing the new requirement would require an extreme level of effort, would be highly manual, leading to potential errors and the risk of utilities being non-compliant with required filings, and ultimately would not be feasible in the QDR submission timeframe.

The Joint Utilities have historically matured their data reporting capabilities in close partnership with Energy Safety. However, the timeline stated in the Compliance Guidelines, “The first of these submissions is required on the deadline for the first Quarterly Data Report after the adoption of these Guidelines”², does not allow the Joint Utilities sufficient time to develop and quality check the new data elements requested. In addition, much of the data requested in the Compliance Guidelines resides in systems designed to support operational activities, not regulatory reporting. Complying with the

¹ Draft Compliance Guidelines at 6.

² Draft Compliance Guidelines at 7.

new schema will require significant updates to source systems, field data collection processes, mapping procedures, and more. This level of change necessitates a phased implementation approach.

In addition to overlap with the Data Guidelines, the new reporting in Section 5.2 appears duplicative of *Section C4.6 Post Mitigation Assets*, in the 10-Year Electrical EUP Guidelines³ – a third guideline document developed and issued by Energy Safety. PG&E plans to submit its EUP filing and respectfully requests that the EUP Guidelines be leveraged as the primary reporting mechanism for this data as EUP reporting also matures.

The Joint Utilities and Energy Safety’s Data Division collaborate through regular working sessions to develop practical, fit-for-purpose data requirements. The Joint Utilities greatly appreciate this effort by the Data Division. The Joint Utilities recommend that CAD participate in these ongoing sessions, which will help ensure that regulatory needs are met in a way that is both achievable and aligned with existing system capabilities and operational realities.

Section 5.3 Field Record and Completion Information specifically asks for “all inspection field notes, long text descriptions, and other narrative information collected from the field during work done pursuant to mitigation activities for mitigation categories of 1) Grid Design, Operations, and Maintenance, and 2) Vegetation Management and Inspections”⁴ to be submitted utilizing the “Field Notes” field available in the current Data Guidelines.⁵ First, the requirement is not clearly specified. Second, descriptions are too long to be included in the fields provided in the QDR submission. Third, the requirement that short text descriptions or codes be translated cannot practically be implemented and is problematic from a practical and data management perspective.

Energy Safety should define what is intended by “inspection field notes” and “other narrative information.” Many field notes are handwritten and would need to be reviewed and digitized and may not be collected in a consistent format across vendors and the different ECs. In addition, throughout the hundreds of thousands of records, there is often confidential information such as employee names, customer names, and phone numbers in field notes and other documentation that would need to be redacted before submittal.

The Energy Safety Template Geodatabase (“GDB”) v4.01⁶ schema enforces a 1,000-character limit for the “Field Notes” attribute. However, it is common for the Joint Utilities to have long text that significantly exceeds that limit. While individual comments may have their own character limits, the aggregated field in the source system does not

³ 10-Year Electrical Undergrounding Plan Guidelines at C-61.

⁴ Draft Compliance Guidelines at 10.

⁵ Data Guidelines v.4.01 at 59.

⁶ [Template Geodatabase \(GDB\) v4.01](#).

appear to have a defined cap, and some entries exceed 790,000 characters. Attempts to load the entire entry into the GDB therefore have resulted in timeouts due to the volume of data.

When reporting field notes, the Draft Compliance Guidelines state that “if short text descriptions or codes are used, (e.g., “Per gf a AMAYA”), the electrical corporation must explain the meaning in plain English.”⁷ However, the “Field Notes” attribute is a free-text field, meaning contributors may enter a wide range of information, including non-standard acronyms and abbreviations. Given there are over 100,000 WMP initiative records that would have “Field Notes” submitted in each quarterly submittal, reviewing every entry and validating abbreviations with the original authors is neither practical nor beneficial. Furthermore, changing internal records as captured in the field is not considered good data governance. Historical records should be preserved as is, and changing or modifying them for compliance reporting does not follow good data governance practices. The Joint Utilities, however, will provide clarification for specific records as needed.

The Joint Utilities understand the CAD’s and the Environmental Science Division’s (“ESD”) need for additional information to support field verification of WMP work. The Joint Utilities request that these two divisions issue specific data requests for the information needed for field verification of select work points. This approach would provide Energy Safety with the information needed to perform field verification work while avoiding the overburdensome and often duplicative reporting requirements that the Draft Compliance Guidelines would place on the Joint Utilities.

Section 5.4 Hybrid Work Information asks utilities to “specify the specific kind of equipment or method actually utilized for each mitigation activity reported in its spatial Quarterly Data Report submission, utilizing the ‘DescriptionOfWork’ field available for use by the electrical corporation in making spatial Quarterly Data Report submissions.”⁸ However, this requirement is vague, contradicts the Data Guidelines, and would be overly burdensome.

The Data Guidelines define the “Description of Work” field as optional, not required.⁹ Instead of including this reporting in the Draft Compliance Guidelines, the Joint Utilities suggest consolidating all data reporting into the Data Guidelines. This requirement also lacks clarity. Whereas the Data Guidelines define domains for required fields, this requirement calls for a new field without defining the specific information needed. For example, “different kinds of equipment” could mean different manufacturers or models for equipment types, different sizes and types of conductors or conduits, or different kinds of materials. This detailed information, such as specific types of equipment used for each vegetation activity, is not currently captured in existing source systems. Similarly, “different methods” could mean various work methods or techniques, or a

⁷ Draft Compliance Guidelines at 10.

⁸ Draft Compliance Guidelines at 10.

⁹ Data Guidelines v. 4.01 at 59.

different work method activity (e.g., manual trimming versus mechanical cutting). This type of data is often documented manually or not documented at all. Therefore, the level of effort to gather this type of project information for tens of thousands of records in each QDR is overly burdensome and would not be feasible to complete in the one-month timeframe permitted by the QDR submission.

It is the Joint Utilities' understanding that this information might aid in CAD's understanding of the type of completed activities and how to inspect them; however, the Joint Utilities can provide CAD with project-specific documentation/information at the time of inspection or in response to targeted data requests. This approach would ensure CAD obtains what is needed to field verify and inspect selected work points and would not require the utilities to gather superfluous and vague information for tens of thousands of records each quarter that ultimately serves no purpose.

Meeting this requirement as written would require a significant investment in field procedures, data collection processes, system enhancements, and workforce training, some of which is dependent on third parties (e.g., outside contractors). To ensure accuracy and feasibility, Joint Utilities request that Energy Safety better define the information being sought in this requirement and work collaboratively with utilities to align with current system capabilities and data governance practices.

Section 5.5 Electrical Corporation Initiative Tracking Databases requires utilities to provide Energy Safety personnel with "read-only access to databases which track the status of mitigation activities in the field, including but not limited to spatial databases, upon request,"¹⁰ and to provide access "no later than five calendar days after the request is made, with access lasting for a minimum of 180 calendar days."¹¹ Across the Joint Utilities, there are more than 100 internal databases that store initiative-related data. These databases contain raw, unstandardized information that has not undergone the quality control processes used to produce the quarterly submissions. Each utility structures its data differently to support internal operations, and direct access to such disparate systems would be inconsistent. In addition, there are significant cybersecurity and technical feasibility issues with this requirement.

Not all systems can grant read-only access, and granting any other access would grant permission to edit or delete information, which could result in unintended consequences. Background checks may be necessary for Energy Safety personnel seeking access, and training would be needed on the use and navigation of each system. Software licenses likely would be necessary for each Energy Safety employee seeking access, and all access personnel would need data handling and protection training specific to the database and system they seek access to. This is not achievable in the five-calendar day timeframe listed in the Draft Compliance Guidelines.

¹⁰ Draft Compliance Guidelines at 10.

¹¹ Draft Compliance Guidelines at 11.

In addition, PacifiCorp's systems and databases include information regarding activities across six states, subject to the respective state's privacy laws. These laws can be inconsistent or divergent between states and ensuring compliance with these various requirements when unfettered access is granted is not feasible. Access to these systems cannot be limited to specific jurisdictions, which unavoidably would provide Energy Safety access to sensitive information across all of PacifiCorp's jurisdictions.

The Joint Utilities currently provide Energy Safety with quarterly views of WMP initiative data in accordance with the Data Guidelines. Additionally, it is our understanding that Energy Safety has the ability to view the submitted Geodatabase files, which contain the same WMP initiative data requested by the Draft Compliance Guidelines (i.e., QDR submission). Therefore, providing the same information would be redundant and would create multiple sources of truth.

If Energy Safety requires assistance in viewing the submitted data, solutions such as an online GIS system can be explored as a possible platform. However, if licenses need to be provisioned, user information would need to be collected, and secure access would need to be established. This process could present challenges for the proposed five-day turnaround.

Given these considerations, the Joint Utilities recommend that Energy Safety continue to rely on the standardized and quality-controlled submissions provided through the Data Guidelines process. The Data Guidelines also can be modified should additional data points be needed. If additional data is needed, the Joint Utilities are open to discussing targeted, feasible solutions that align with operational and security constraints.

Should this requirement be implemented, it is imperative that a solid data management/governance paradigm be put in place. Sharing only the information that is needed to accomplish the task at hand is a fundamental aspect of data security and is consistent with common cybersecurity standards.

The Joint Utilities also urge Energy Safety to revise the requirement that access must be granted within 30 days of the adoption of the Draft Compliance Guidelines. Given that there are significant technical and legal challenges to implementing this proposal—including addressing cybersecurity concerns, confidentiality concerns, and data management concerns—this 30-day deadline should either be removed or significantly extended.

B. Requirements Outlined in *Section 6.0 Electrical Corporation Annual Report on Compliance* lack clarity and require information that conflicts with WMP Technical Guidelines

Section 6.1.a requires “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 for compliance years up to 2025.”¹² The Joint Utilities recommend removing the requirement to report on summarized objectives for the 10-year WMP plan cycle, as a 10-year WMP plan cycle does not exist. Section 4.2 of the 2023-2025 WMP Technical Guidelines¹³ only includes plan objectives for the three-year WMP cycle.

Section 6.1.b requires reporting on 10-year objectives from the 2023-2025 WMP beginning in 2026¹⁴; however, the 2026-2028 WMP governs utility activities starting in 2026 and supersedes prior plans. Requiring continued reporting on outdated objectives introduces confusion and is misaligned with the current framework. The WMP Guidelines no longer include 10-year objectives, as the term “objectives” has been replaced with “qualitative targets,” and the focus is now on one- and three-year targets within each cycle.¹⁵ There is no current guidance for reporting on 10-year objectives that were developed in the 2023-2025 WMP cycle. If legacy objectives align with qualitative targets developed in the 2026-2028 WMP, the Joint Utilities will address them accordingly within that plan. Therefore, the requirement to report on 2023-2025 10-year objectives should be removed, and compliance obligations applicable to the 2026-2028 cycle should be clearly defined in forthcoming Compliance Guidelines.

Section 6.1.d requires an explanation of whether the expected percentage risk reduction listed in Section 8 of the WMP was achieved. The Joint Utilities would like to clarify that the expected percentage risk reduction is calculated for a specific project set for each mitigation and is not only dependent on whether the target was achieved. Specific projects that are ultimately implemented may vary due to constraints and limitations discussed in the WMP, which would thereby alter the actual percentage risk reduction even if the numerical target was achieved. The Joint Utilities encourage CAD to consider in its compliance determination whether the risk reduction intent was achieved by implementing the targeted mitigation.

Section 6.5 asks for “a dataset for the compliance period covered by the EC ARC containing fields, tables, and all other information required for a non-spatial Quarterly Data Report submission by Energy Safety’s Data Guidelines, provided in the same format required by the Data Guidelines, sent as an appendix to the EC ARC and using data that is current as of the date of its submission with the EC ARC.”¹⁶ The Joint Utilities request clarification on whether this requirement is the same submission as the Annual-End of Year (“EOY”) Data Tables required in version 4.01 Data Guidelines or is in addition to that submission. If the requirement is a submission that is separate from the Annual-EOY Data Tables, clarity on how it differs from the Q4 QDR submission is requested.

¹² Draft Compliance Guidelines at 11.

¹³ 2023-2025 Wildfire Mitigation Plan Technical Guidelines at 10.

¹⁴ Draft Compliance Guidelines at 11.

¹⁵ Draft 2026-2028 WMP Guidelines, OEIS Public Workshop Presentation, November 26, 2024, at 28.

¹⁶ Draft Compliance Guidelines at 14.

C. Reporting on Wildfire Safety Concerns should be further defined and consistent with other sections of Compliance Guidelines.

For accurate and consistent reporting, the Joint Utilities request Energy Safety define the status for WSCs including *pending*, *resolved*, *cancelled*, and *closed*.

- Pending = WSC issued, awaiting remediation
- Resolved = utility has remediated the WSC
- Cancelled = utility determines WSC does not require further action; requires explanation as to why no further action is required
- Closed = when Energy Safety acknowledges the WSC has been resolved

The Joint Utilities request that Energy Safety include consistent language clarifying that the 14-calendar-day deadline for submitting WSCs is extended to the next business day when it falls on a Saturday, Sunday, or holiday.

The Joint Utilities request that Energy Safety allow the submission of one master list, rather than multiple batches, to streamline reporting and drive efficiencies. To support this approach, the Joint Utilities propose using a standardized batch naming convention to clearly identify individual batches within the master list.

The Joint Utilities appreciate the clarity in Table 3: Electronic File Submission Locations, particularly the specification of designated email addresses (i.e., compliance@energysafety.ca.gov and environmentalscience@energysafety.ca.gov). To support streamlined communication and operational efficiency, the Joint Utilities intend to continue utilizing only the specified email addresses for submissions and respectfully request that individual staff members be included in the specified email inboxes.

D. The Joint Utilities request that Energy Safety include the listing of the Independent Evaluator’s ARC evaluation requirements.

As provided in the Compliance Guidelines published in September 2024, the Joint Utilities request that the Request for Qualifications (“RFQ”) requirements that apply to each contracted independent evaluator throughout the IE ARC evaluations be provided to the electrical corporations at the same time it is released to IEs in order to be fully prepared and aligned.

E. The Joint Utilities request that the language requiring extensions for responses to data requests be emailed within one business day from receipt be removed.

Section 8.3 Data Requests requires ECs to send requests for extensions within one business day from receipt.¹⁷ However, due to the high volume of data requests, it is not always possible to review the request and provide an accurate and complete response in the required timeframe. There are numerous reasons why the need for an extension

¹⁷ Draft 2025 Compliance Guidelines at 18.

may arise that was not initially apparent. Thus, Section 8.3 should be revised to state that: "If an electrical corporation needs an extension of time respond to a data request, it must email the originator of the data request as soon as reasonably possible, copying all emails identified in the original data request, providing cause for the extension, and the amount of additional time requested."

F. Monthly Meetings not Identified in the Compliance Guidelines

The Draft Compliance Guidelines do not address Energy Safety's required monthly meetings with its various compliance areas. The Joint Utilities request this information be added to the final Compliance Guidelines. In addition, agendas should be provided at least two weeks in advance of a meeting to allow utilities adequate time to prepare. The Joint Utilities also request that an email address be specified in Table 3 for sending meeting materials.

II. Conclusion

The Joint Utilities respectfully request that Energy Safety take these recommendations into account in the Final Compliance Guidelines.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company