

August 08, 2025

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Docket # 2026-2028-Base-WMPs

RE: Submission of LSPGC's 2026-2028 Wildfire Mitigation Plan – Substantive and Non-Substantive Errata

Dear Deputy Director Marino:

Pursuant to Section 7 of the Energy Safety Policy Division Process Guidelines (Version 1.0, adopted February 21, 2025), LS Power Grid California (LSPGC) hereby submits its substantive and non-substantive errata related to the 2026–2028 Wildfire Mitigation Plan (WMP).

Following the submission of LSPGC's initial Base WMP on July 25, 2025, the company received and responded to data request from Energy Safety. In the course of responding to these requests and conducting internal QA/QC, LSPGC identified areas requiring correction or clarification. These updates include substantive modifications, such as revisions to LSPGC's asset energization timeline and clarification of the work order priority scale, as well as other corrections that affect the technical or evaluative substance of the plan. In addition, non-substantive adjustments have been made to improve clarity, formatting, and internal consistency.



A redlined version of the affected pages of the WMP and the affected tables are attached in accordance with submission protocols, along with the following summary of each change and the rationale for its inclusion.

Section	Page	Edit	Reason	Errata
1	1	Changed "second half" to "Q2" of 2028.	The revised language reflects a more specific and current project schedule based on planning timelines.	Substantive
4.1	17-19	Changed "(Q3-Q4 2028) to "Q2 2028)	The revised language reflects a more specific and current project schedule based on planning timelines.	Substantive
5.2.2.3	31	Corrected normalization range from "1–6" to "0–5" in the description of risk score scaling.	The 1-6 range was a typographical error; "0-5" is the correct scale used consistently throughout the submission and supporting documents.	Non- Substantive
8.1	65	In the Table 8-1, the section and page number of the GD-06 was updated from "8.6;90" to "8.8;94."	The section and page reference for GD-06 in Table 8-1 was updated to reflect its correct location in the current document.	Non- Substantive



Section	Page	Edit	Reason	Errata
8.2.11	67	Changed "LSPGC has established its inaugural PSPS program as part of this WMP" to "LSPGC has	The updated language provides a more precise description of LSPGC's ongoing efforts related to	Substantive
		initiated efforts toward establishing its inaugural PSPS program as part of this WMP."	PSPS program development, aligning with the current stage of implementation planning.	
8.4.3	77	Updated inspection frequency for connectors and	The original reference to "quarterly" was likely a	Substantive
		clamps from "quarterly" to "monthly."	typographical error. The correction aligns with LSPGC's intended inspection schedule and current operational practice.	



Section	Page	Edit	Reason	Errata
8.4.4	77	Updated inspection frequency for conductors and rigid and strain bus from "quarterly" to "monthly."	The original reference to "quarterly" was likely a typographical error. The correction aligns with LSPGC's intended inspection schedule and current operational practice.	Substantive
8.5.2	85	In LSPGC Table 8-1 QA and QC Procedures, the date for the LSPGC Emergency Operations Plan was updated from 07/02/2024 to 01/01/2025.	The revised date aligns with the version of the procedure submitted as an attachment, ensuring consistency between narrative references and supporting documentation.	Non- Substantive
8.6	90-91	Added mapping between LSPGC's internal 0–3 priority scale and CPUC GO 95 Rule 18 levels.	To enhance transparency and demonstrate regulatory alignment by clearly linking LSPGC's internal prioritization with GO 95 Rule 18 classification levels.	Substantive



Section	Page	Edit	Reason	Errata
9.1	101	In Table 9-2, changed units and targets for VM-05, VM-06 and VM-07 to reflect changes made during	Updated to reflect corrections made during review of Annual Data Submittal	Substantive
		annual data submittal process. VM-05 changed from n/a for all quarterly targets except 2028 Q4 which is 100. VM-06 changed from n/a for all quarterly targets		
		except 2028 Q4 which is 100. VM-07 changed from n/a for all quarterly targets except 2028 Q4 which is 20.		
9.2, 9.2.1.3, 9.2.2.3,	102, 103, 104,	Updated citation of "NERC FAC- 003-4" to "NERC	The change reflects the most current version of	Non- Substantive
9.2.3.3, 9.3.2, 9.4.2, 9.10.2, Appendix E	105, 106, 108, 115, 219	FAC-003-5" in the list of applicable vegetation management standards.	the NERC FAC- 003 standard, ensuring the submission references up-to- date regulatory requirements.	



Section	Page	Edit	Reason	Errata
9.2.1.6	104	Updated anticipated energization timing from "late 2028" to "Q2 of 2028."	The revised language reflects a more specific and current project schedule based on planning timelines.	Substantive
9.5.2	110	Updated date of the Transmission Vegetation Management Plan from "January 2024" to "March 15, 2024."	The original date was likely a typographical error. The correction aligns with the version submitted as part of the final WMP package.	Non- Substantive
9.6.1	110	Removed extraneous character ("L") from the beginning of the sentence referencing defensible space around transmission substations.	The original text included a typographical error. The correction improves clarity without altering content.	Non- Substantive



Section	Page	Edit	Reason	Errata
9.6.2	111	Updated effective date of the Substation Defensible Space Procedure from "07/01/2025" to	The revised date aligns with the version of the procedure submitted as an attachment,	Non- Substantive
		"07/21/2025."	ensuring consistency between narrative references and supporting documentation.	
9.7.2	112	Updated date of the Transmission Vegetation Management Plan from "January 2024" to "March 15, 2024."	The original date was likely a typographical error. The correction aligns with the version submitted as part of the final WMP package.	Non- Substantive
9.11.1	116	Updated energization timeline reference from "mid to late 2028" to "Q2 of 2028."	The revised phrasing provides a more accurate and updated timeline based on current project planning and supports consistency with other sections of the submission.	Substantive



Section	Page	Edit	Reason	Errata
9.11.2	119	Updated energization timeline reference from "mid to late 2028" to "Q2 of 2028."	The revised phrasing provides a more accurate and updated timeline based on current project	Substantive
			planning and supports consistency with other sections of the submission.	
9.11.2	119	Updated effective date of the Substation Defensible Space Procedure from	The revised date aligns with the version of the procedure submitted as an	Non- Substantive
		"01/01/2025" to "07/21/2025."	attachment, ensuring consistency between narrative references and supporting documentation.	
10.1	125	Updated energization timeline reference from "mid to late 2028" to "Q2 of 2028."	The revised phrasing provides a more accurate and updated timeline based on current project planning and supports consistency with other sections of the submission.	Substantive



Section	Page	Edit	Reason	Errata
10.1	126	In Table 10-1 Situation Awareness Targets by year, the number for 2028 Total/Status for	The value was finalized to reflect current design progress and to align with the annual WMP tables	Yes
		SAF-01 (Quantitative) was updated from "TBD based on final design" to 72.	submitted by LSPGC. This update improves consistency and provides a clear, measurable target.	
10.1	126	In Table 10-1 Situation Awareness Targets by year, the	This was updated to reflect its correct location in the current	Non- Substantive
		section and page number for SAF-01 (Qualitative) was updated from 10.3;132 to 10.4;139.	document.	
10.1	127	In Table 10-1 Situation Awareness Targets by year, the page number for SAF-	This was updated to reflect its correct location in the current document.	Non- Substantive
		O4 (Quantitative) was updated from 140 to 146.	2.0.0 3.11.01.13.	



Section	Page	Edit	Reason	Errata
10.1	127	In Table 10-1 Situation Awareness Targets by year, the page number for SAF- 05 (Qualitative) was updated from10.5;142 to 10.5.4;146	This was updated to reflect its correct location in the current document.	Non- Substantive
10.3.1	134	Corrected document title from "Operators Training Process Manual" to "Operations Training Process Manual" and updated date from "March 5, 2025" to "March 7, 2025."	The revision aligns the citation with the correct title and date of the attached document submitted with the WMP, ensuring accurate cross-reference.	Non- Substantive
10.5.5	146	Inserted missing period after the word "meteorologist" in the sentence: "forecasting tools employed by the contracted meteorologist. This will be reevaluated"	To improve readability and correct typographical oversight.	Non- Substantive



Section	Page	Edit	Reason	Errata
10.5.5	146	Updated energization timeline reference from "Q4 2028" to "Q2 2028."	The revised phrasing provides a more accurate and updated timeline based on current project planning and supports	Substantive
			consistency with other sections of the submission.	
10.6.1	147	Removed parenthetical text "(Tracking ID: ENV- WTH-004)" following the	The tracking ID reference was removed to improve clarity, as it did not	Non- Substantive
		vendor name "StormGeo."	correspond to any document or identifier provided in the submission.	

Please contact me at ryadav@lspower.com or 208-281-8255 if you have any questions or require additional information regarding this submission.

Sincerely,

Rituraj Yadav Associate Manager, Wildfire Mitigations LS Power Grid California 122 S. Capital of Texas Hwy, STE 100 Austin, TX 78746

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Attachments:



LSPGC\_2026-2028\_BASE-WMP\_RO\_Redline.pdf LSPGC\_2026-2028\_Base-WMP\_Tables\_RO\_Errata\_REDLINE.xlsx