LS Power Grid California

August 12, 2025

DATA REQUEST RESPONSE
LS POWER GRID CALIFORNIA (LSPGC)

Data Request No: OEIS-P-WMP_2025-LSP-002

Request Party: Office of Energy Infrastructure Safety

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Please find enclosed LSPGC's response to OEIS data request Q01 – Q02. The following information is provided by the following individual:

Q#	Information Provided By	Affiliation to LSPGC	Contact	Business Address

01 – 02	Rituraj Yadav, Associate Manager, Wildfire Mitigation	Employee	208-281-8255 / ryadav@lspower.com	1122 S. Capital of Texas Hwy, STE 100, Austin, TX 78746

If you have any questions, please contact me at ryadav@lspower.com or 208-281-8255.

Sincerely,
Rituraj Yadav

OEIS Data Request Q01

Regarding Vegetation Management Procedures Documents:

a) Provide the most recent versions of the following procedures documents referenced in the 2026-2028 Base WMP:
   i. Transmission Vegetation Management Program Policy and Procedures
   ii. LSPGC Substation Defensible Space Procedure
   iii. LSPGC Emergency Operations Plan.

b) Sections 9.2, 9.2.1.3, 9.2.2.3, 9.2.3.3, 9.3.2, 9.4.2, and 9.10.2 in the 2026-2028 Base WMP refer to NERC FAC-003-4. Did LS Power intend to reference the most current version of the reliability standard, NERC FAC-003-5?

Response to OEIS Data Request Q01

a) Please refer to the attachments.
   a. TVMP Policy and Procedures filed via e-file system. Name of the documents are listed below:
      i. "LSPGC TVMP Policy v1.1"
      ii. "LSPGC TVMP Procedure v1"

b. LSPGC Substation Defensible Space Procedure file via e-file system. The name of the document is listed below:
    i. "LSPGC Substation Defensible Space v1.1"
c. LSPGC Emergency Operations Plan file via confidentiality e-file system. The name of the document is listed below:
    i. "LSPGC EOP-11 Emergency Operations Plan v.1"

b) Yes, we intended to refer to NERC FAC-003-5. This has been fixed via substantive errata e-filed by LSPGC on 08/08/2025.

OEIS Data Request Q02

Regarding Section 9.12.1 Work Orders Priority Assignment:
Pursuant to GO 95 Rule 18(B)(1)(a)(i), a level 1 priority condition requires the electrical corporation "Take corrective action immediately, either by fully repairing the condition, or by temporarily repairing and reclassifying to a lower priority." LSPGC Table 9-1 in the 2026-2028 Base WMP defines Priority 1 "Risk Level" as "Immediate safety, reliability, or fire risk with potential for significant impact," and "Response" as "Address as soon as possible."

a) Define "as soon as possible" as used above. Include the maximum time in hours allowed between identifying a Priority 1 issue and fully repairing, or temporarily repairing and reclassifying, the issue.
b) Define "Immediate safety, reliability, or fire risk" as used above.

Response to OEIS Data Request Q02

a) LSPGC defines "as soon as possible" for Priority 1 conditions as:

- Corrective action must be taken immediately, or within 96 hours, with a reporting allowance of up to 30 days.

LSPGC currently has no energized transmission lines; its first line is expected to enter service in Q2 2028. LSPGC will develop supporting documentation consistent with 2026-2028 WMP initiatives.

b) "Immediate safety, reliability, or fire risk," as referenced in LSPGC Table 9-1 under Priority 1 "Risk Level," refers to any observed condition or hazard that:

- Poses a direct threat to public or worker safety (e.g., downed conductors, exposed energized components, equipment failure in proximity to public areas)
- Compromises the operational reliability of the electrical system (e.g., critical infrastructure outage, imminent risk of cascading failure)
- Presents a significant potential for fire ignition or propagation, particularly in high fire-threat districts (e.g., vegetation contacts with conductors, failed fire protection devices, or compromised fire hardening infrastructure).

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