



LS Power Grid
California

Document Type:
Procedure

Document Number:
LSPGC-SDS

Substation Defensible Space



Effective Date:
July 21, 2025

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Date	Version	Revised By		Comments
07/21/2025	1.0	n/a		New Procedure for LSPGC
8/11/2025	1.1	RH		Logo update

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1.0 Introduction

1.1 Purpose

The execution of inspections and subsequent mitigations in this procedure, in conjunction with LSPGC's Wildfire Mitigation Plan, are intended to minimize the risk of a fire ignition event within substations that could propagate outward from electrical equipment. The defensible space program intends to ensure public safety and generally follows California Public Resource Code Section 4291 (under the CA Department of Forestry and Fire Protection).

1.2 Scope

This procedure provides instructions for the Defensible Space Inspections of energized Substations and Equipment, when applicable:

- Performing inspections.
- Managing vegetation for the purpose of creating defensible space.

1.3 Review and Approval

This document is current as of the date on the title page. The Associate Manager, Wildfire Mitigation has overall responsibility for this plan as the document owner, with field activities to be executed by LSPG Field Services department. This plan shall be approved by the Director, Asset Management. This document shall be reviewed as needed based on system expansion, changes in regulations, or other factors.

1.4 Document Maintenance

The document owner is responsible for the maintenance of the document. Responsibilities include documenting revisions, reviews, and approvals.

Five minor changes will be allowed without signatory approval. These changes may be for spelling, grammar, or correcting minor deficiencies. These changes shall be tracked by increasing the document version by a fractional point value. As an example, Rev 1.0 becomes Rev 1.1 indicating one minor revision from the signatory approval.

Substantive or significant changes shall be reviewed and approved via signature. These changes shall be tracked by increasing the document version by a point value. As an example, Rev 1.0 becomes Rev 2.0.

2.0 Applicability

Transmission Field Services personnel are responsible for implementing this plan for all energized LSPGC substations.

3.0 Acronyms and Definitions

HFTD: High-fire threat district as defined by the California Public Utilities Commission

LSPG: LS Power Grid

LSPGC: LS Power Grid California, LLC

4.0 Defensible Space Inspection Procedure

4.1 Frequency

- Defensible Space Inspections shall be performed monthly.

4.2 Zone 1 (Clean Zone)

- Applicability: ALL SUBSTATIONS and immediately surrounding property under LSPGC ownership or control.
- Within 30 feet of the exterior fence of a substation or the LSPGC property boundary if boundary is within 30 feet of the exterior fence:
 - Area shall be clear of accumulating dead vegetation, including leaves, sticks, pine needles, or weeds
 - Area shall be clear of any trees, shrubs, or bushes
 - Area shall not be used for storage of any wood or other combustible material
 - Grasses shall be maintained at a height of 4 inches or less

4.3 Zone 2 (Reduced Fuel Zone)

- Applicability: SUBSTATIONS LOCATED IN HFTD OR Very High Fire Hazard Severity Zones in the State Responsibility Area. Please consult with the Associate Manager, Wildfire Mitigation to obtain the latest designations for LSPGC substation locations.
- Beyond 30 feet from the substation exterior fence to the lesser of 100 feet from the substation fence or the LSPGC property boundary:
 - Area shall be clear of loose surface litter exceeding a depth of 3 inches; UNLESS
 - Surface litter is located in an area that cannot be safely accessed such as steep cliffs or severe rocky slopes and is isolated from other fuels
 - Area shall be clear of any trees, shrubs, or bushes; UNLESS
 - Trees, shrubs, or bushes are located in an area that cannot be safely accessed such as steep cliffs or severe rocky slopes and is isolated from other fuels
 - Area shall not be used for storage of any wood or other combustible material
 - Grasses shall be maintained at a height of 4 inches or less; UNLESS
 - Grass is necessary to stabilize soil or is in an area with existing erosion issues; THEN permit grass to reach a height of ten (10) inches
 - Grass is located in an area that cannot be safely accessed such as steep cliffs or severe rocky slopes and is isolated from other fuels

4.4 Documentation

- Documentation of Defensible Space Inspection results shall be compiled in an inspection report.

4.5 Mitigation of Inspection Findings

- Any findings determined to not comply with the requirements of Sections 4.2 and 4.3 shall be corrected within thirty (30) calendar days. Documentation of the corrective action shall be appended to the appropriate inspection report.

5.0 Quality Assurance

No less than once per calendar year, the Supervisor, Field Services or his designee who is not the person responsible for performing the Defensible Space Inspections, shall perform a field review of the most recent Defensible Space Inspection.

This review should be timed to be performed within seven (7) days of a monthly inspection if travel schedules allow. The Supervisor or designee shall review field conditions versus the most recent inspection report and document any discrepancies in an inspection audit report.

Any discrepancies identified shall be reported to the Director, Field Services and the Associate Manager, Wildfire Mitigation who will work together to create a Corrective Action Plan.

6.0 Training

Training on the Substation Defensible Space procedure will be provided upon request.

7.0 Records Retention

LSPGC field services personnel will retain all documents, records, and reports related to the Defensible Space Inspections for a period of no less than three (3) years.

8.0 References

LS Power Grid California Wildfire Mitigation Plan
California Public Resource Code Section 4291