



August 18, 2025

**DATA REQUEST RESPONSE
LS POWER GRID CALIFORNIA (LSPGC)**

Data Request No: OEIS-P-WMP_2025-LSP-003

Request Party: Office of Energy Infrastructure Safety

Originator: Johan Im, Wildfire Safety Analyst

Johan.Im@energysafety.ca.gov

cc: Nicole Dunlap

Nicole.Dunlap@energysafety.ca.gov

Dakota Smith

Dakota.Smith@energysafety.ca.gov

Robert Warwick

Robert.Warwick@energysafety.ca.gov

Alex Weissman

Alex.Weissman@energysafety.ca.gov

Colin Lang

Colin.Lang@energysafety.ca.gov

Date Received: Tuesday, August 12, 2025

Due Date: Friday, August 22, 2025

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

| Q# | Information Provided By | Affiliation to LSPGC | Contact | Business Address |
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| 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 |
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If you have any questions, please contact me at ryadav@lspower.com or 208-281-8255.

Sincerely,
Rituraj Yadav

OEIS Data Request Q02

Regarding Vegetation Management QA and QC Activity Targets:

Page 116, section 9.11.1 of LS Power's 2026-2028 Base WMP states "For operational substations qualified field personnel will thoroughly document the results of monthly substation and vegetation management condition inspections. At least once per calendar year, LSPGC Field Operations Supervisor or his designee will perform a field audit of a defensible space inspection to verify that the inspection results are in accordance with procedures and observed field conditions." This narrative shows LS Power performs QC on 1 defensible space inspection, making "defensible space inspection" the population/sample unit. Additionally, this narrative shows LS Power will perform 12 annual defensible space inspections for each operational substation, for a projected 24 inspections, making the population size "24 inspections".

However, Table 9-6 shows a population/sample unit of "substation" and population sizes of "2".

- a. Is the narrative in 9.11.1 correct?
 - i. If yes, are the values in Table 9-6 correct?

1. If yes, explain why the narrative describes different values than those listed in Table 9–6.

Response to OEIS Data Request Q02

- a. Yes, the narrative in Section 9.11.1 is correct. LSPGC conducts monthly defensible space inspections for each operational substation, resulting in 12 inspections per substation annually, or a total of 24 inspections for the two operational substations. In this context, the population/sample unit is each defensible space inspection event.

The values in Table 9–6 are accurate under the current definition of “population” as substations, which results in a population size of “2.” The table’s intent is to reflect the number of operational assets subject to the defensible space program, not the total number of inspection events.

To reconcile the two and improve consistency across the WMP, LSPGC intends to file an application for substantive errata to revise Table 9–6 so that the population/sample unit is expressed as inspection events, matching the narrative in Section 9.11.1. This change would remove the discrepancy by redefining the table’s population from assets to events, while maintaining the same underlying inspection program.