



SAFETY AND ENFORCEMENT DIVISION MONTHLY PERFORMANCE REPORT

May 2024



California Public
Utilities Commission

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Introduction

The CPUC's Safety and Enforcement Division (SED) oversees the safety of electric and communication facilities, natural gas infrastructure and propane facilities. SED is comprised of three branches of utility engineers, analysts and investigators that focus on ensuring the safety of utility infrastructure and reducing utility caused wildfires. SED advocates for public safety through performing safety audits, conducting incident investigations, and appearing in CPUC safety proceedings. SED has the authority to issue citations with penalties against utility operators who violate public utility safety codes and requirements.

Gas Safety and Reliability Branch (GSRB)

The Gas Safety and Reliability Branch (GSRB) ensures that intra-state natural gas and liquid petroleum gas (LPG) pipeline systems are designed, constructed, operated, and maintained according to safety standards set by the CPUC and the federal government. CPUC gas safety engineers are trained and qualified by the federal government. The CPUC enforces natural gas and LPG safety regulations; inspects construction, operation, and maintenance activities; and makes necessary amendments to regulations. Its mission is to protect and promote the safety of the public and utility employees that work on the gas pipeline systems. May 2024 external activities included:

- Meeting with the Office of Environmental Health Hazard Assessment (OEHHA) to discuss PG&E’s Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX) sampling results
- National Association of Pipeline Safety Representatives (NAPSR) Western Region Meeting
- Risk Assessment Training led by Kent Muhlbauer of WKM Consultancy, LLC for all GSRB staff

SED has the authority to issue citations with penalties for operator violations of public utility safety codes and requirements. The citation process allows the CPUC to act expediently in matters where violations of state and federal rules are clear and unambiguous. Citations may arise out of an ongoing investigation into related matters when a violation is brought to the CPUC’s attention directly. Previous citations can be found on the CPUC’s website [here](#). There are currently no outstanding gas safety citations.

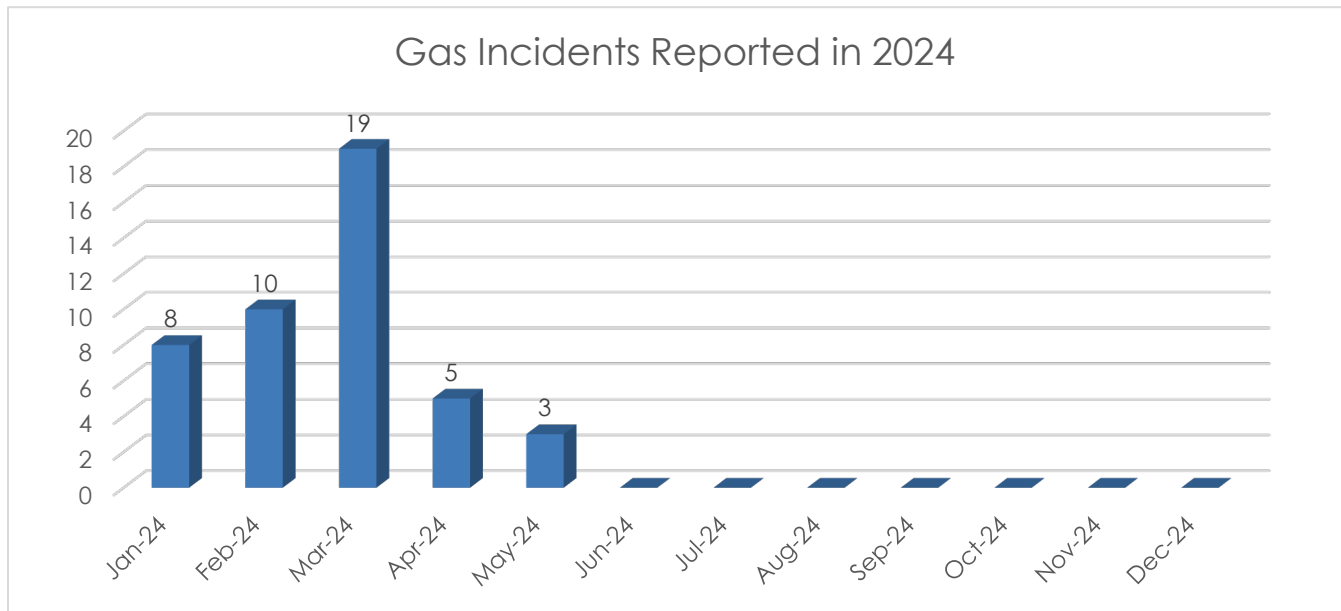
Natural Gas Inspections (Year to Date)

The purpose of GSRB’s inspections is to confirm that operators continue to construct, operate, and maintain their pipeline facilities in a manner that ensures the safety of workers and the public. In addition to routine inspections, GSRB also conducts on-site construction inspections. Typically, each inspection consists of a records review of an operator’s past compliance activities, and field verifications. Results are documented in a final report and sent to the operator after the inspection. The expectation is to have a final report sent to the operator within 60 days of the inspection. GSRB will submit an Inspection Closure Letter to the operator within 120 days from the day the inspection is completed. The table below shows GSRB’s inspection activity year-to-date in 2024.

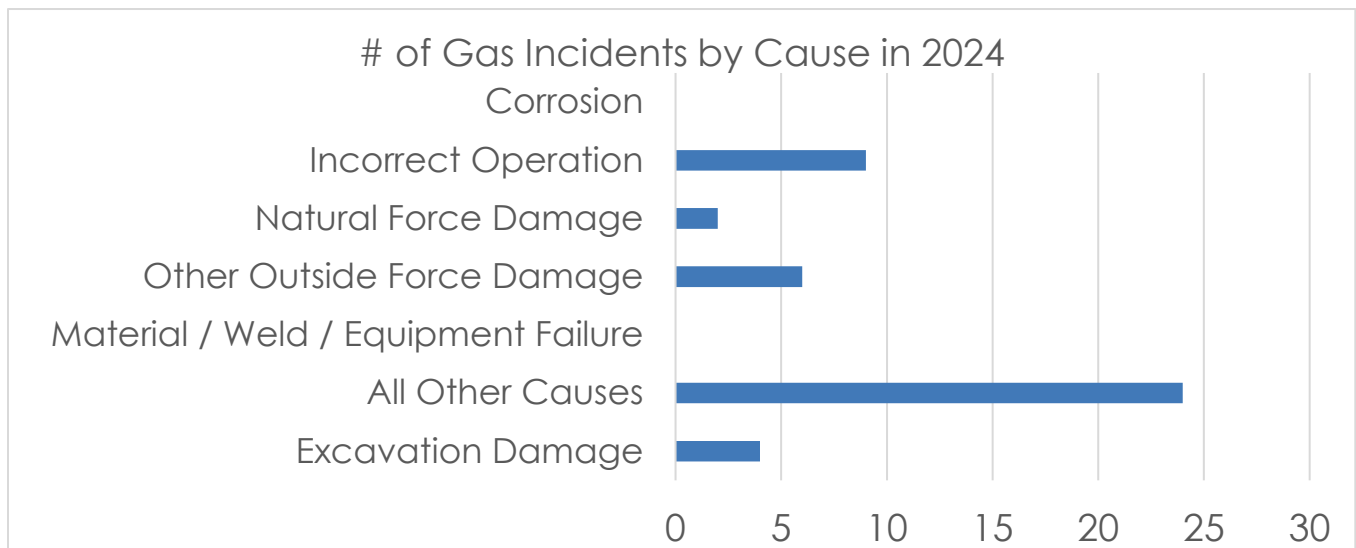
Inspections	Year to date, through May 2024
Conducted	16
Final Report Completed	10

Natural Gas Incident Reports and Investigations through May 2024

As of May 31, 2024, GSRB Staff has received reports of 45 incidents. All reported incidents are assigned to GSRB engineers to investigate and prepare a final report. The report indicates if there were any violations of General Order (GO) 112-F committed by the operators. Operators report incidents based on the criteria outlined in GO 112-F.



The bar chart below shows the 45 incidents by cause as of May 2024.



The table below shows the 42 incidents by incident level and status.

Status	Level 1	Level 2	Level 3	Level 4	TOTAL
Open	1	10	5	0	16
Closed	26	2	1	0	29
TOTAL	27	12	6	0	45

The table below describes the four incident levels and provides the timeframes/guidelines for incident reports to be completed and closed from the date of assignment of an investigation.

Levels	Definition of Incident Levels	Guidelines
1	Did not result in injury, fatality, fire or explosion; may be due to an unrelated event outside of the Operator’s control.	60 days
2	Did not result in injury, fatality, fire or explosion; may or may not have caused a release of gas, have been reported due to Operator judgment.	120 days
3	Resulted in a release of gas but did not result in injury, fatality, fire or explosion.	150 days
4	Resulted in injury, fatality, fire or explosion caused by release of natural gas from the Operator’s facilities.	≥ 180 days

Natural Gas Utility Self-Identified Violation (SIV) Investigations

There were no Self-Identified Violations reported to GSRB in May 2024.

Customer Safety Complaints

GSRB received and investigated five (5) new customer complaints and inquiries in May.

One (1) complaint was closed after GSRB determined no IOU involvement was present. One (1) complaint was closed after GSRB confirmed that the IOU had addressed the issue prior to the complaint. Two (2) complaints were resolved after GSRB prompted the IOU to address the complaints. One (1) inquiry was closed after GSRB addressed the Public Records Act request.

Inspection Notices / Notice of Probable Violation Letters (NOPV)

SED may issue an NOPV based on an investigation, customer complaint, or inspection for a violation of an applicable law or regulation. In May, GSRB issued 3 inspection notices and 1 NOPV letter.

- May 8 – PG&E Operations, Maintenance, and Emergency Plans inspection letter – 0 probable violations found.
- May 10 – PG&E Bay Area North Transmission Area inspection letter – 5 probable violations found.
- May 24 – SDG&E Borrego Springs LNG Facility inspection letter – 0 probable violations found.
- May 28 – SDG&E Miramar Transmission Area inspection letter – 0 probable violations found.

Natural Gas Safety and Reliability Proceedings

Mobile Home Parks (MHP) Utility Conversion Program (D.20-04-004) (Commissioner Rechtschaffen /ALJ Hecht) (SED Advocacy): On April 24, 2020, the Commission issued Decision 20-04-004 which established the Mobile Home Park Utility Conversion Program (MHP-UCP) which authorizes IOUs to install new gas and electric utility systems in mobile home parks to replace master-metered utility systems. The program goal is to convert 50% of all mobile home spaces by the end of 2030 according to a risk-based priority ranking system developed by GSRB. GSRB received forms of intent from 986 mobile home communities before the deadline on March 31, 2021. SED created a risk-prioritization list which included new applicants, and parks still on the Pilot list from 2015, and ranked them according to their utility system’s risk of failure. SED has delivered the priority list to all participating investor-owned utilities, and the utilities are currently working with MHP Owners to plan and execute conversion projects. There are currently 586 “Category 1” parks, which have a total of 37,890 spaces. SED estimates the utilities will start the conversion process with these Category 1 Parks sometime before the second priority list is produced in July 2025.

In February 2024, the utility companies filed their required MHP-UCP Annual Reports, which track (among other things) the numbers of MHP spaces converted to direct service for gas and electric, both to the meter (TTM) and beyond the meter (BTM), and the cost of those construction projects in 2023, as described in the table below:

Summary of 2024 MHP-UPC Annual Reports by Utility

Utility	Electric Spaces Installed (TTM)	Electric Spaces Installed (BTM)	Gas Spaces Installed (TTM)	Gas Spaces Installed (BTM)	Total Cost
Bear Valley Electric	0	0	n/a	n/a	\$0
Liberty Electric	265	265	n/a	n/a	\$5,547,104
PacifiCorp	0	0	n/a	n/a	\$2,833
PG&E	1,186	1,173	2,022	1,991	\$62,410,262

Utility	Electric Spaces Installed (TTM)	Electric Spaces Installed (BTM)	Gas Spaces Installed (TTM)	Gas Spaces Installed (BTM)	Total Cost
SCE	1,559	1,538	n/a	n/a	\$22,549,927
SoCal Gas	n/a	n/a	2,279	2,782	\$18,198,355
SDG&E	128	628	70	567	\$24,589,849
Southwest Gas	n/a	n/a	278	275	\$4,973,166

Since the beginning of the MHP Utility Conversion Pilot Program in 2015, the utilities have reported installing new electric services to 39,652 spaces and installing new gas services to 45,859 spaces. The utilities have reported spending \$1.42 billion on construction projects and management of this program.

In accordance with Ordering Paragraph #4 of D.20-04-004, SED is required to post a list of the MHPs that were re-prioritized in the prior year due to extenuating circumstances by April 1 of each year. Extenuating circumstances that allow for adjustment on prioritization lists include wildfire (or other large-scale fire incident), earthquake, destructive flooding, other natural disasters, public unrest or riot, and catastrophic damage from foreign objects (such as aircraft crash or train derailment). In 2023, SED authorized the re-prioritization of one park with 50 spaces.

The full reports, as well as a list of reprioritized parks, can be found on the MHP-UCP [webpage](#).

PG&E Locate and Mark Practices OII (I.18-12-007) (Commissioner Rechtschaffen/ALJ Allen)

(SED Advocacy): On February 20, 2020, the Commission issued Decision 20-02-036 which closed this Investigation but via the Settlement between Pacific Gas & Electric Company (PG&E), the Commission’s Safety and Enforcement Division (SED), and the Coalition of California Utility Employees (CUE), the Commission ordered several shareholder-funded gas and electric System Enhancement Initiatives (SEI) but with a longer compliance audit period of four years and a \$110 million total penalty.

On April 24, 2024, PG&E submitted its fourth Locate and Mark Annual Report. The reporting period for this Annual Locate and Mark Report is from January 1 to December 31, 2023.

Electric Safety and Reliability Branch (ESRB)

The mission of ESRB is to enforce state statutes and regulations regarding the safety and reliability of electric facilities, communication facilities, and power plants that are within the jurisdiction of this Commission in California, to ensure that the facilities are operated and maintained in a safe and reliable manner, to protect and promote the public health and safety, and to facilitate an environment inside and outside of the Commission that increases the safety and reliability of these facilities. May 2024 activities are below and include:

- Conducted 6 Electric Distribution audits, 2 Communication Infrastructure Provider (CIP) audits, and 1 Substation audit
- Issued 1 Substation audit report, 2 Electric Distribution audit reports, 1 Transmission audit report, 1 CIP audit report, and 2 Power Plant audit reports.

ESRB reviews daily outage reports from power plants. Outages could be forced or planned. ESRB reviews the status and cause of each outage, may issue data requests related to the status and cause of each outage, and will follow up with power plants regarding the outage as necessary. In May 2024, ESRB monitored the status of 3 planned outages and 5 forced outages reported by natural gas and renewable energy power plants.

Electric Facilities Citations

SED has the authority to issue citations with penalties for electric utilities and Communication Infrastructure Providers (CIPs) for violating Commission General Orders (GO) and Public Utility Code (PU Code) rules. Citations may arise from violations discovered during incident investigations, audits, customer complaint investigations, whistleblower investigations, or other safety matters that are brought to the attention of SED.

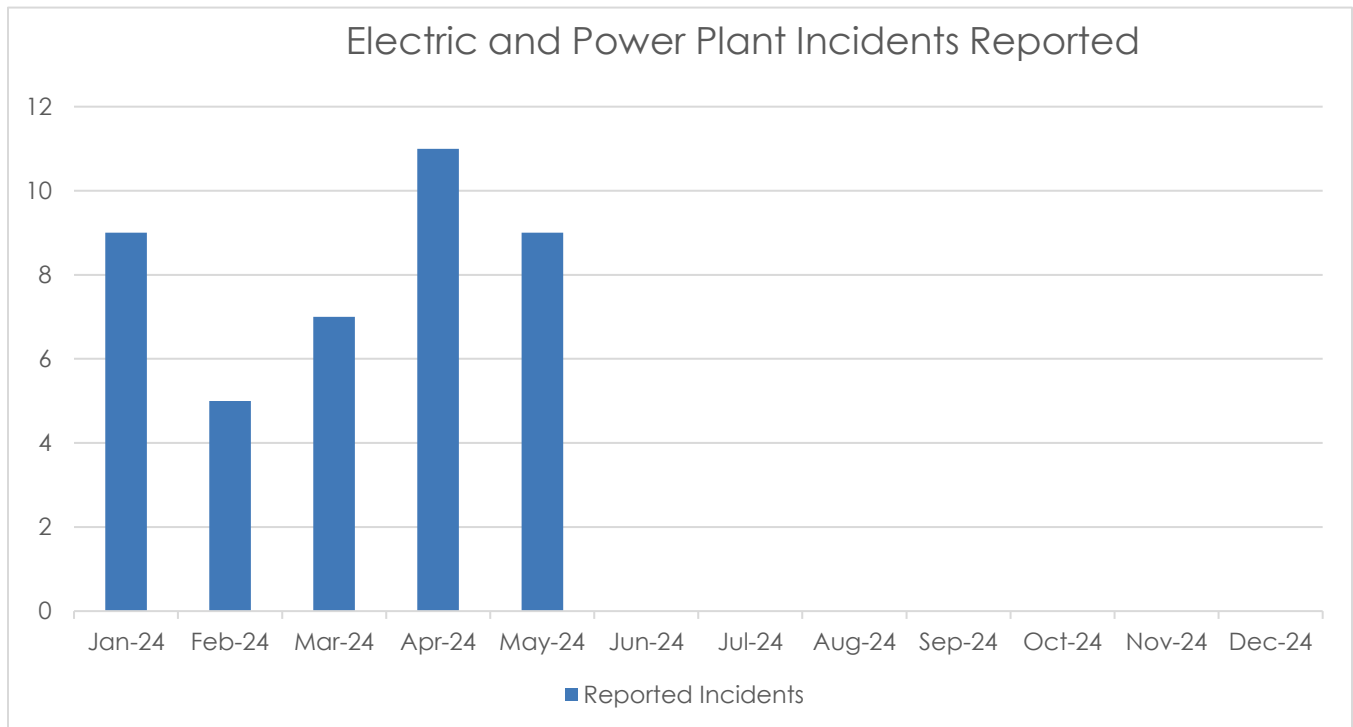
The table below shows the status of citations issued by ESRB in 2022 and 2024. ESRB did not issue a citation in 2023. All ESRB citations related to electric and communication facilities can be found on the Commission’s website [here](#).

Citation Number	Utility	Amount	Violations	Date Cited	Description	Status
D.16-09-055 E.21-10-001	PG&E	\$100,000	General Order (GO) 95, Rule 38, Minimum Clearances of Wires from Other Wires	10/21/2022	Failing to maintain minimum clearance between conductors on the same crossarm.	Paid on November 18, 2022.
D.16-09-055 E.22-11-001	SCE	\$1,020,000	GO 95, Rule 31.1, Design, Construction and Maintenance	11/15/2022	Failing to install and maintain its 66 kV conductor and insulator adequately and safely.	Paid in December 2022.

Citation Number	Utility	Amount	Violations	Date Cited	Description	Status
D.16-09-055 E.22-12-001	SCE	\$4,500,000	Three violations of GO 95, Rule 31.1, Design, Construction and Maintenance	12/16/2022	Failing to follow its Contractor Safety Management Standard (CSMS) which may have resulted in a fatal injury.	Appealed/ Pending.
D.16-09-055 E.24-02-001	SCE	\$2,404,000	Two violations of GO 95, Rule 31.1, Design, Construction and Maintenance, and two violations of GO 95, Rule 38, Minimum Clearances of Wires from Other Wires	2/5/2024	Failing to install overhead facilities properly to allow them to maintain the required GO 95 clearance during normal conditions.	Paid on February 16, 2024.

Electric and Power Plant Incidents Reported

ESRB received 3 electric incident reports and 6 power plant incident reports in May 2024.



Electric Facilities and Power Plant/Generation Incident Investigations

Incident status		Level 1	Level 2	Level 3	Level 4	Total ¹²
Total open incidents	Electric Facilities	7	9	52	48	116
	Generation	11	0	7	2	20
Total incidents reported in 2024	Electric Facilities	3	2	12	14	31
	Generation	10	0	4	1	15
Total incidents closed in 2024	Electric Facilities	2	4	22	15	43
	Generation	1	0	0	0	1
Total open 2024 incidents	Electric Facilities	3	2	10	14	29
	Generation	9	0	4	1	14
Incidents reported in May 2024	Electric Facilities	1	0	1	1	3
	Generation	4	0	2	1	6
Incidents closed in May 2024	Electric Facilities	0	0	5	1	6
	Generation	0	0	0	0	0

The table above shows information about ESRB incident investigations as of May 31, 2024, and incidents reported and closed in May 2024. The level designation indicates increasing severity, with Level 4 as the most severe. See footnote 2 for definitions of each level. The guidelines to close incident reports are similar to those GSRB follows (see Guidelines table in the GSRB section).

Customer Safety Complaints

ESRB investigated 16 electric and communication safety and reliability customer complaints in May 2024.

² Level 1: A safety incident that does not meet Level 2, 3, or 4 criteria. Level 2: Incident involved a power interruption not due solely to outside forces (Level 2 for Generation: Incident that occurred during an Electric Alert, Warning or Emergency. Level 3: Incident involved damage estimated to exceed \$50,000 and caused, at least in part, by the utility or its facilities (Level 3 for Generation: Incident resulted in a significant outage that was due, at least in part, to plant equipment and/or operations). Level 4: Incident resulted in a fatality or injury requiring hospitalization and that was caused, at least in part, by the utility or its facilities or by equipment and/or operations (for Power Plants).

Notice of Violation Letters

ESRB issued 1 Notice of Violation (NOV) letter in May 2024. ESRB may issue an NOV in response to an investigation or customer complaint for a violation of an applicable law or regulation.

Electric Safety and Reliability: Proceedings

SCE Appeal of the Kramer Citation (K.23-01-011) (ALJ Kelly) (SED Advocacy): ESRB investigated an incident that occurred on January 18, 2018, at the Kramer Junction in San Bernardino County. The incident resulted in the fatality of an employee of SCE's contractor. On December 16, 2022, SED issued a \$4,500,000 citation to SCE for violations related to the incident. In January 2023, SCE appealed the citation.

On June 30, 2023, the ALJ issued a Ruling that set dates for evidentiary hearings. On October 3, 2023, SED and SCE reached a settlement agreement to resolve, and dispose of all claims, allegations, liabilities, and defenses related to SED's Citation. On October 17, 2023, SED and SCE jointly submitted to the Commission a motion for approval of their settlement agreement. In December 2023, SED and SCE filed a joint brief to further elaborate on how the settlement agreement comports with the Penalty Assessment Methodology (PAM), as requested by the ALJ. Pending.

Creation of a Shared Database or Statewide Census of Utility Poles and Conduit (I.17-06-027); Communications Provider Access to Poles (R.17-06-028) (Commissioner Batjer/ALJ Mason) (SED Advocacy): In 2017, the Commission opened a proceeding to address the feasibility of establishing a data management platform for pole owners and tenants to access pole data, attachment and conduit data. This investigation is being conducted in three tracks. In the current phase of the proceeding, parties addressed requirements for pole attachments via comments and are awaiting a proposed decision. On December 15, 2020, the Assigned Commissioner's Office issued a Second Amended Scoping Memo and Ruling that outlined the next steps in the consolidated Pole OII/OIR proceeding. On March 9, 2021, the ALJ issued a Ruling that requested parties to file comments by April 12, 2021, on a One-Touch-Make-Ready (OTMR) proposal.

On June 15, 2022, the Commission issued an Amended Scoping Memo and Ruling to address Track 3 issues, which relate to conduit data. Such issues will be identified by a subsequent ruling from either the Assigned Commissioner or the assigned Administrative Law Judge. The Ruling also set a procedural schedule for the One-Touch-Make-Ready Decision, the Conduit Data Ruling, and the Conduit Data Decision.

On September 16, 2022, the Commission issued a Proposed Decision that adopts CPUC staff's One Touch Make Ready (OTMR) requirements. OTMR is an expedited process for attachment of communication facilities that require “simple make-ready” work. On October 27, 2022, the Commission issued Decision 22-10-025 which adopts, with modifications, the One-Touch Make-Ready Staff Proposal amendments to the Right-of-Way Rules.

In July 2023, multiple parties submitted Requests For Extension to comply with Ordering Paragraph 8 of D.21-10-019, the Track 2 Decision Adding Attachment Data To Pole Owner Databases Ordered in Decision 20-07-004. Ordering Paragraph 8 requires pole attachers to “provid[e] the information required by Phase 1 Data Points 1-5 and 18-20 in Attachment A for existing and new pole attachments within 12 months from the date the Tier 2 Advice Letters of the five major pole owners in California ... were approved.”

On February 28, 2024, the ALJ issued a ruling denying the previously filed Motion by Joint Pole Attachers requesting that the pole attachment information they are required to provide to the Major Pole Owners be exempt from public disclosure.

In May 2024, SED attended a 3-day workshop to address Track 2, Phase 2 – Technical Review of 12 Data Points and Use of Data Points. The workshop was organized and hosted by pole owners as required by Decision 21-10-019. Pending.

Petition to Adopt New General Order 95 (GO 95) Rules and Regulations Governing the Design and Construction of Overhead Electric and Communications Facilities (P.24-03-014) (Commissioner Baker/ALJ Rizzo) On March 11, 2024, SCE filed a Petition on behalf of the General Order 95/128 Rules Committee to amend General Order 95 (GO 95) to incorporate the Load and Resistance Factor Design (LRFD) methodology in lieu of the current Safety Factor methodology. The petition requests that the Commission adopt a package of 21 proposed rule changes (PRCs) designed to incorporate LRFD into GO 95, as well as five related Ancillary Rule Changes (ACRs). ESRB reviewed the Petition and filed a Response on April 17, 2024. Pending.

Other ESRB Activities

Progress Update for the ongoing Administrative Consent Order (ACO) agreement between SED and SCE for the 2017-2018 Southern California Wildfires: The Administrative Consent Order (ACO) between SED and Southern California Edison (SCE) regarding the 2017-2018 Southern California Wildfires was approved by the Commission in December 2021. The ACO required that SCE pay the cost of fines, safety measures and disallowances totaling \$550 million. Of that amount, SED and SCE discussed SCE's strategies and priorities for deploying the \$65 million in shareholder funds that were allocated specifically for safety measures.

On January 19, 2023, discussions continued to establish progress reporting criteria and timelines, and to prepare for spending the initial funds on activities in the first quarter of 2023. In addition to technical studies, data analysis, and proceeding support actions, SCE proposed that some of the funding be used for activities related to secondary firebreak protection and community protection in the form of subsidies to governmental and non-governmental entities to purchase and operate transit vans during local emergencies. SED has been meeting with SCE monthly to discuss SCE's progress with the implementation of the safety measures. No significant updates in May 2024.

Compliance with Decision 20-05-019 regarding PG&E's 2017 and 2018 Wildfires (I.19-06-015): On May 8, 2020, Decision (D.) 20-05-019 was issued approving a Settlement Agreement, with modifications, between SED, PG&E, Coalition of California Utility Employees (CUE), and the Office of Safety Advocates (OSA). On December 4, 2020, a Final Decision (D.20-12-015) was issued modifying D. 20-05-019 and denying rehearing of D. 20-05-019. The Decision imposes penalties on PG&E totaling \$2.137 billion consisting of \$1.823 billion in disallowances for wildfire-related expenditures, \$114 million in shareholder-funded System Enhancement Initiatives, and a \$200 million fine payable to the General Fund (the fine to be suspended). ESRB is monitoring PG&E's work to ensure compliance with the Settlement Agreement and D. 20-05-019. On February 12, 2021, and consistent with D. 20-05-019, PG&E filed its first semi-annual report which provided updates and an overview of PG&E's progress on each of the 20 corrective actions in the Settlement Agreement.

The Settlement Agreement requires PG&E to implement Safety Enhancement Initiatives (SEI). PG&E hired contractor David Mason + Associates (DMA) to conduct the independent audits under the SEI #14 which addresses Wildfire Safety audits.

SEI #14: Independent Wildfire Safety Audits requires PG&E to retain a Safety Evaluator(s), defined as an independent consultant(s), who will review PG&E's policies, procedures, practices, and financial data concerning (a) PG&E's Tree Tracker Application, (b) Overhead Distribution and Transmission Preventative Maintenance Program, (c) Local Conditions Study of PG&E's territory and (d) Evidence Collection and Retention.

On August 2, 2023, DMA reviewed PG&E's Vegetation Management (VM) procedures, General Order 95, and Public Resources Code. DMA is also reviewing One VM App which runs on vendor-supplied mobile devices and utilizes the Lemur mobile app for data collection. Lemur is geospatial in nature allowing both Inspection and Tree Crews to physically see on a map where the work is occurring and takes away the need to carry paperwork requests or log inspections via paper map procedures. The One VM App provides a map-centric interface to direct users to work locations while adding scheduling and dispatch features to plan and execute field work. Monthly meetings between DMA, PG&E, and SED began in September 2023.

DMA is continually reviewing the One VM App and is currently reviewing PG&E's VM inspection and tree work orders to select locations for field inspections. In October 2023, DMA was still finalizing the field audits (site visits) schedule. In November 2023, DMA began conducting field work and "shadowing"

PG&E’s VM crews to check the functionality of the One VM App in the field. CPUC continued conducting site visits in December 2023 by shadowing DMA and PG&E’s VM crews.

On December 6 and 7, 2023, SED conducted field visits in Willits and Laytonville to observe One VM App in the field with PG&E and DMA. DMA also conducted field visits in December 2023 to observe/survey PG&E VM staff on the usability/reliability of the One VM app. On January 11 and 25, 2024, SED had bi-weekly meetings with DMA and PG&E to monitor the progress of site visits. DMA is continuing the site visits and surveys of PG&E VM pre-inspector (PI) personnel and tree crews. In February 2024, DMA continued site visits and plans to complete the site visits by March 26, 2024.

SED staff conducted a site visit with DMA and PG&E in Oakland on March 18 to evaluate the field use of the VM app by a PG&E contractor vegetation management (VM) pre-inspector and the tree crew. SED observed DMA conduct interviews of the tree crew and pre-inspector who stated the VM app had issues at first but had improved over time and now functioned well. DMA completed its field work on March 26, 2024. DMA’s next step is to draft the final report by the end of April for SED and PG&E to review.

In April 2024, DMA informed SED that the draft Audit Report is not yet ready for review by SED and PG&E.

In May 2024, DMA informed SED that it expects to complete the draft in June 2024.

Technical Workshop on Energy Storage Systems Operation and Maintenance Standards: On March 26, 2024, ESRB hosted a technical workshop to present a walkthrough of the proposed revisions to General Order (GO) 167-B to implement operation and maintenance standards for energy storage systems as required by SB 1383. ESRB also addressed all concerns by workshop participants. The workshop presentation and materials are posted on the CPUC Electric Generation Safety and Reliability [webpage](#).

In May 2024, ESRB hosted a second workshop that was attended by Generator Asset Owners (GAOs) to address the implementation of Senate Bill 1383.

Transmission Maintenance Coordination Committee (TMCC): TMCC is an advisory committee to help the California Independent System Operator (CAISO) develop, review, and revise Transmission Maintenance Standards. TMCC holds quarterly meetings to discuss recent improvements in construction and maintenance processes and techniques, and industry best practices. ESRB is a member of TMCC and attends meetings.

A meeting of the Transmission Maintenance Coordination Committee (TMCC) occurred on April 18, 2024. The Standard Maintenance Reporting System (SMRS) data collected in March 2024 was discussed. The SMRS collects maintenance data from Participating Transmission Owners (PTOs) and with that data the California Independent System Operator (CAISO) analyzes maintenance data trends associated with different types of equipment, assesses the effectiveness of a participant’s maintenance program, reviews the impacts of changes in maintenance practices using a single platform, and encourages participants to engage

in advanced planning informed by the history of maintenance activities from prior years. Equipment categories within the scope of the reporting requirements include insulators, bushings, arrestors, poles, circuit breakers, transformers, and reactive devices.

The SMRS report requires that participants furnish data such as equipment type, number of facilities, description of the maintenance task, number of planned tasks, number of actual tasks completed, information when planned activities are not completed, and a section for miscellaneous information that the PTO wants to provide. CAISO routinely adds new categories of equipment to be reported on in the SMRS and standardizes the reporting criteria across member Participating Transmission Owners (PTOs) to make the data useful for TMCC analysis and feedback.

Summer Reliability

Each summer, ESRB implements its Summer Reliability Operating Procedures to assist the CPUC and other agencies in ensuring electric generation reliability from June to September. ESRB's Summer Reliability Standard Operating Procedure consists of two parts:

1. Summer Reliability Data Request and Analysis

Under Section 10.1 of General Order (GO) 167-B, the ESRB generation section prepares the summer reliability preparedness data request (SR-DR) to send to all Generating Asset Owners (GAOs) the first week of April. The previous year's data request is modified to reflect the current year's concerns. ESRB coordinates with other divisions (i.e., Energy Division) and state agencies (i.e., California Energy Commission (CEC)) to obtain their input on questions for the SR-DR. The GAOs are directed to respond to all the questions in the SR-DR in 30 days. Once the GAOs' responses are received, ESRB Generation Section staff review and analyze the GAOs' responses regarding operation and maintenance practices, staffing status, fuel and water supply issues, environmental restrictions, parts, and technical service procurement pertaining to summer reliability. Generation Section staff conduct follow-ups as necessary, including follow-ups with GAOs who have not complied with the request. These processes and endeavors provide ESRB with a comprehensive understanding of the GAOs' summer preparedness for all types of power generating resources under CPUC jurisdiction. These processes also equip Generation Section staff with topics of focus for audits, investigations and other enforcement activities.

This year, an additional data request was included in the SR-DR regarding Battery Energy Storage Systems (BESS). The purpose of this request is to help establish BESS operation and maintenance standards for inclusion in GO 167-B for the implementation of Senate Bill 1383. With the number of BESS systems installed growing rapidly throughout the state, it is crucial to ensure the ongoing reliability of these systems given the tight electric power grid situation during the summer. The modification process is underway to include energy storage systems in the existing GO 167-B.

2. Daily Summer Outage Monitoring

Each year, ESRB staff monitors power plant outages throughout the summer season which runs from June 1st to October 31st each year. The purpose of monitoring outages is to ensure that ESRB can track any significant outages that could impact system reliability, as well as to ensure compliance with the operation and maintenance standards of GO 167-B. Since 2017, all jurisdictional GAOs have been required to report their planned and forced outages to SED daily through the Power Plant Outage Reporting system (PPOR). These requirements apply to all jurisdictional fossil fuel and renewable generating assets. Energy storage systems are also expected to be under these requirements upon approval of the proposed modifications to GO 167-B. Information on power plant outages is primarily obtained from the PPOR. ESRB staff also supplements this information with information from the CAISO Outage Management System (CAISO OMS) and CAISO website of Outage Management.³ During the summer period GAOs are required to report full and partial *forced outages* of 50 MWs or greater which are 2 hours or longer in duration, and any *planned outages* of 50 MWs or greater which are 24 hours or longer in duration.

Two assigned ESRB staff monitor daily outages and analyze the nature of these outages concerning safety and reliability. Staff will also follow up with power plants to collect detailed outage information as needed. ESRB staff then compile the weekly activity for all significant outage events into a weekly report for CPUC management. When an extreme heat wave event is called, the ESRB supervisor deploys the assigned engineer to be on-call and available to conduct any necessary rapid response audits. Rapid response audits can be triggered by several factors such as a forced outage, an outage greater than 50 MW, outages lasting longer than 24 hours, media coverage, outages in isolated location, or a load pocket during extreme heat wave events.

ESRB's efforts toward summer reliability data requests and daily outage monitoring are essential to achieve the ultimate purpose of ESRB: maintain and protect the public health and safety of California residents and businesses, ensure that electric generating facilities are effectively maintained and operated, and ensure electrical service reliability and adequacy.

³ CAISO website of Outage Management: [Outages | California ISO \(caiso.com\)](https://www.caiso.com/Outages)

Wildfire Safety and Enforcement Branch (WSEB)

WSEB is dedicated to the enforcement of public utility wildfire safety and Public Safety Power Shutoff (PSPS) violations. WSEB is the lead investigator for utility incidents relating to wildfire, PSPS events and other aspects related to wildfire events. The staff conducts incident investigations and provides input into policy development.

May 2024 activities for WSEB:

- Currently investigating nine (9) utility-related wildfires.
- No PSPS events in May 2024.
- Participated in SCE’s Q2 PSPS Regional Working Group Meetings on May 8-9, 2024.
- Observed SDG&E's PSPS Functional Exercise on May 13-16, 2024.
- Observed Bear Valley Electric’s PSPS Tabletop Exercise on May 17, 2024.
- Observed PacifiCorp’s PSPS Tabletop Exercise on May 22, 2024.
- Observed Liberty Utilities’ PSPS Tabletop Exercise on May 23, 2024.

Activations, De-energizations and Post Event Reports in May 2024

PSPS Activities	PG&E	SCE	SDG&E	Bear Valley Electric	PacifiCorp	Liberty Utilities
Total PSPS Activations	0	0	0	0	0	0
Total PSPS w/De-energizations	0	0	0	0	0	0
Total PSPS Post Event Reports Reviewed	0	0	0	0	0	0

WSEB Wildfire and PSPS Enforcement Actions to Date

WSEB Wildfire/PSPS Enforcement	Enforcement Action	Citation/ Resolution Number	Utility	Penalty Amount	Date Approved
SDG&E 2020 PSPS Events	Administrative Enforcement Order	Resolution M-4863	SDG&E	\$24,000	10/06/2022
PacifiCorp 2020 PSPS Events	Administrative Enforcement Order	Resolution M-4862	PacifiCorp	\$0	10/06/2022
SCE 2020 PSPS Events	Administrative Enforcement Order	Resolution ALJ-440	SCE	\$7,000,000	06/08/2023
PG&E 2020 PSPS Events	Administrative Enforcement Order	Resolution ALJ-445	PG&E	\$8,000,000	10/12/2023
Brewer Fire	Staff Citation	D.16-09-055 W.23-05.001	PG&E	\$132,500	05/05/2023
Mule Fire	Staff Citation	D.16-09-055 W.23-08.001	PG&E	\$1,074,000	08/29/2023
Dixie Fire	Administrative Consent Order	Resolution SED-8	PG&E	\$45,000,000	01/25/2024
Old Fire	Staff Citation	D.16-09-055 W.24-04.001	PG&E	\$800,500	4/22/2024

PSPS-Related Proceedings and Events

Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions (R.18-12-005) (President Reynolds /ALJ Kao/ALJ DeAngelis) (SED Advisory): The Commission opened this Rulemaking to further examine policies and guidelines adopted in ESRB-8 regarding communication, notification, mitigation and other logistic and implementation issues of a Public Safety Power Shutoff (PSPS) event.

On July 12, 2022, Pioneer Community Energy, Sonoma Clean Power Authority, East Bay Community Energy, Marin Clean Energy, and Rural County Representatives of California (collectively, the “Joint Parties”) filed a motion requesting the Commission open an expedited track of the Public Safety Power Shutoff (PSPS) Rulemaking 18-12-005 to address issues associated with the investor-owned utilities’ (IOU) “fast trip” settings and to adopt rules to govern these settings. Pacific Gas and Electric Company (PG&E),

Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) filed responses opposing the motion. The California Energy Storage Alliance, Joint Local Governments, and Center for Accessible Technology filed comments in support of the motion.

In July 2022, Safety and Enforcement Division staff met with representatives from the Joint Parties to listen to their concerns and their recommendations. The Joint Parties' Motion is pending Commission action.

On February 23, 2023, President Reynolds issued a Ruling pertaining the July 12, 2022 Joint Parties' Motion. The Ruling responded to the Motion and directed CPUC staff to hold a public workshop outside the instant De-Energization Rulemaking to identify the appropriate range of issues and questions that may help the Commission form a proposed scope and actions on the emerging challenges associated with reliability, including consideration of rules for governing the electric IOUs' fast trip programs. The workshop was held on March 17, 2023 and included presentations from each of the large electric IOUs. The workshop also included a presentation from the parties who filed the Joint Parties' Motion.

Public Safety Power Shutoff (PSPS) Citation Program: On September 21, 2023, the Commission approved a new citation program for PSPS. This authorization expands the CPUC's already existing PSPS enforcement capabilities, which include Orders Instituting Investigation, Orders to Show Cause, and Administrative Enforcement Orders. This new citation program establishes a tool that CPUC staff may use when appropriate to swiftly cite utilities for lack of compliance with PSPS guidelines. The PSPS citation program covers violations in the areas of reporting, notifications, community resource centers, and the IOUs' PSPS websites. It will help encourage complete and timely compliance with the PSPS guidelines and deter violations. Under the program, each citation, which might constitute multiple offenses, may not exceed \$8 million.

Enhanced Powerline Safety Settings

PG&E, SCE, and SDG&E have adjusted "fast trip" settings, also known as Enhanced Powerline Safety Settings (EPSS), on their equipment as a wildfire mitigation measure. The utilities have stated that the altered settings reduce wildfire risk, but these settings have resulted in unplanned outages for which advance notification is not possible. Formal guidance has been limited from the Commission regarding "fast trip" settings.

While there is no existing requirement for each of the IOUs to report on Protective Equipment Device Settings (PEDS) outages specifically and separately, President Marybel Batjer's October 25, 2021 letter to PG&E imposed reporting requirements for PG&E to report its Enhanced Powerline Safety Settings (EPSS) program performance.

PG&E's reports and more information on PG&E's Enhanced Powerline Safety Settings can be found [here](#).

Monitoring the Whistleblower Website and Safety Hotline

The Commission regulates privately-owned utilities. It serves the public interest by protecting consumers and ensuring that utility services and infrastructure are safe, reliable, and available at reasonable rates. It is charged with ensuring that these regulated service providers comply with the regulations. Whistleblower complaints can result in investigations that may involve safety and other issues. In May 2024, fourteen (14) whistleblower submissions and five (5) safety hotline inquiries were sent online to SED.