



SAFETY AND ENFORCEMENT DIVISION MONTHLY PERFORMANCE REPORT

April 2022



California Public
Utilities Commission

Contents

- INTRODUCTION** 1
- GAS SAFETY AND RELIABILITY BRANCH (GSRB)** 1
 - Natural Gas Inspections (Year to Date) 2
 - Natural Gas Incident Reports and Investigations in April 2022..... 2
 - Natural Gas Utility Self-Identified Violation (SIV) Investigations 4
 - Customer Safety Complaints 4
 - Inspection Notices / Notice of Probable Violation Letters (NOPV) 4
- ELECTRIC SAFETY AND RELIABILITY BRANCH (ESRB)** 8
 - Electric Facilities Citations 9
 - Electric and Power Plant Incidents Reported in April 2022..... 9
 - Customer Safety Complaints 11
 - Notice of Violation Letters 11
 - Electric Safety and Reliability: Proceedings..... 11
 - Other ESRB Activities 12
- WILDFIRE SAFETY AND ENFORCEMENT BRANCH (WSEB)** 14
 - PSPS Activations, De-energizations & Post Event Reports - April 2022..... 14
 - PSPS Related Proceedings 14
- Monitoring the Whistleblower Website and Safety Hotline** 16

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This Report reflects Safety and Enforcement Division’s monthly work product. It has not been approved by the Commission rather it is information provided by the Division.

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 who work on the gas pipeline systems. April 2022 activities:

- A. In-person meeting with Pipeline and Hazardous Materials Safety Administration (PHMSA) Deputy Administrator Tristan Brown
- B. Meeting with PG&E regarding GIS implementation
- C. Meeting with California Geologic Energy Management (CalGEM), California Energy Commission (CEC)
- D. Leadership meeting with Southwest Gas
- E. PHMSA 40th State Pipeline Legal Forum
- F. SED Power Hour presentation

SED has the authority to issue citations with penalties for operator violations of public utility safety codes and requirements¹. 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. The table below shows the status of pending citations issued by SED. The citations can be found on the CPUC’s website [here](#).

Citation Number	Utility	Amount	Violations per GO 112-F	Date Cited	Description	Status
G-20-08-001	Glenview Mobile Lodge	\$50,000	192.605(a), 192.605(b)(3), 192.616(j), 192.723(b)(2), 192.747(a), 192.805, 192.1015(a), 192.357(a), 192.479(a), & 192.353(a)	8/24/20	The MHP failed to remediate violations discovered during an inspection	Alternative Dispute Resolution (ADR) conducted on 12/22/21. Pending.

¹ In December 2011, the CPUC created a citation process authorizing staff to impose fines for natural gas violations.

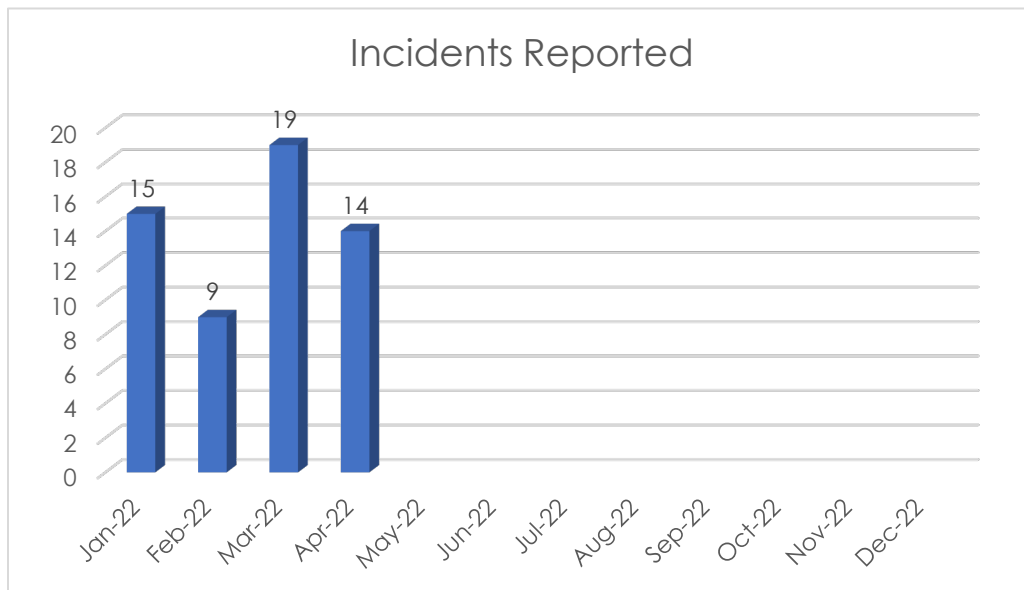
Natural Gas Inspections (Year to Date)

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 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 2022.

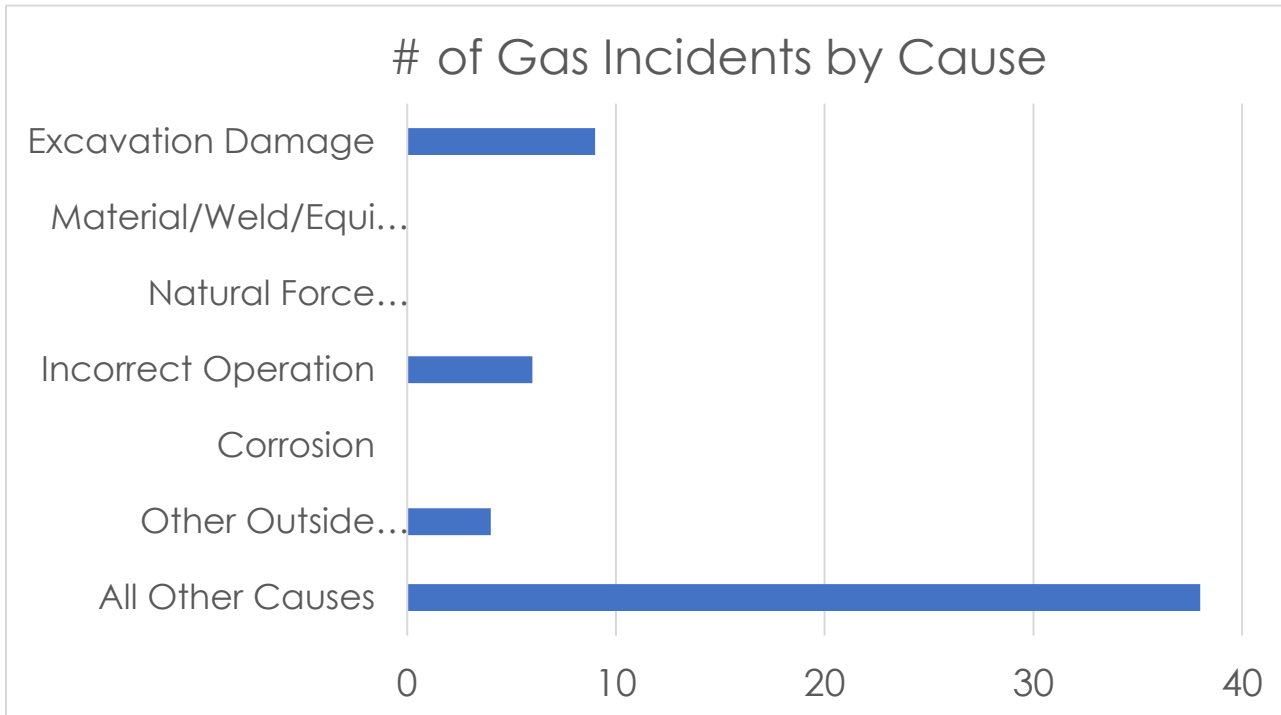
Inspections	Year to April 2022
Conducted	16
Final Report Completed	9

Natural Gas Incident Reports and Investigations in April 2022

As of April 30, 2022, GSRB Staff received reports of 57 incidents in 2022. All reported incidents are assigned to GSRB engineers to investigate and prepare a final report. The report indicates if there were any violations of GO 112-F by the operators. Operators report incidents based on criteria outlined in GO 112-F.



This bar chart below shows the 57 incidents by cause as of April 30, 2022.



The table below shows the 57 incidents by incident level and status.

Status	Level 1	Level 2	Level 3	Level 4	TOTAL
Open	3	10	1	1	15
Closed	36	5	1	0	42
TOTAL	39	15	2	1	57

The table below provides a description of 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 April.

Customer Safety Complaints

GSRB received and investigated two (2) new customer inquiries in April.

One inquiry was closed without further action after GSRB addressed the question.

The remaining one (1) inquiry is being investigated and listed as: municipal government inquiry into IOU boring program.

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 April, GSRB issued 4 inspection notices and 1 NOPV letter (with 1 probable violation).

- April 7 – SoCal Gas’ Operation and Maintenance and Emergency Plans inspection letter – 0 probable violations found.
- April 7 – SDG&E’s Operation and Maintenance and Emergency Plans inspection letter – 0 probable violations found.
- April 18 – Lodi Gas Storage’s Operator Qualification and Anti-Drug & Alcohol Misuse Programs inspection letter – 1 probable violation found.

- April 27 – PG&E’s Distribution Integrity Management Program inspection letter – 0 probable violations found.
- April 28 – Gill Ranch Storage’s Operation and Maintenance Plans and Control Room Management Program inspection letter – 0 probable violations found.

Natural Gas Safety and Reliability: Proceedings

Aliso Canyon (I.19-06-016) (Commissioner Rechtschaffen /ALJs Hecht / Poirier) (SED Advocacy):

Please find proceeding highlights from the month of April 2022 below:

- April 01, 2022:
 1. The Public Advocates Office (Cal Advocates) and Safety and Enforcement Division (SED) filed their joint response opposing Southern California Gas Company’s (SoCalGas) motion to admit these exhibits and documents into the evidentiary record:
 - a. Exhibits SoCalGas-168 through 175
 - b. Exhibit SoCalGas-176
 - c. Exhibits SoCalGas-17 and -18
 - d. All docket filings made in proceeding I.19-06-016, and all attachments to any filing to the extent such attachments or exhibits are accompanied by a sworn declaration under penalty of perjury, except any filing that has been excluded or stricken by ALJ Ruling.
 2. SoCalGas submitted its response opposing Cal Advocates’ Motion to enter into the evidentiary record 55 exhibits (CalPA-412 through CAIPA-466).
 3. SoCalGas submitted its response requesting that the ALJs deny SED’s Motion to admit nine exhibits (SED-324 through 332) into the evidentiary records, arguing that the exhibits are not relevant and material, and outside the Scoping Memo.
- April 08, 2022:

SED stated that it had completed its review of all the emails received from the Commission and found no documents that were responsive to the ALJs’ Ruling requiring an expanded document search dated February 2, 2022, or the ALJs’ Ruling addressing two motions to compel dated November 29, 2021.
- April 11, 2022:
 1. SoCalGas submitted a response to SED’s Motion for Guidance, arguing that it was in fact a motion to amend or reconsider ALJ rulings and was improper.
 2. ALJs ruled on three motions filed by SED, Cal Advocates, and SoCalGas to enter exhibits into the evidentiary record, and ruled that:
 - I. The motion for entering exhibits into the record filed by SED on March 18, 2022 is granted in part, and denied in part.
 - a) The portions of Exhibit SED-324 that consist of the SoCalGas data responses to SED data requests 167 and 168 are entered into the evidentiary record as Exhibit SED-324. SED shall serve a corrected copy of Exhibit SED-324 within seven days.

- b) Exhibit SED-332 is entered into the evidentiary record.
 - c) Exhibits SED-325 through SED-331 will not be entered into the record.
- II. Cal Advocates' March 18, 2022 motion to add documents to the evidentiary record and the March 28, 2022 supplemental motion to add documents to the evidentiary record are granted in part, and denied in part.
- (a) Exhibits CalPA-417, CalPA-451, CalPA-453 and CalPA-455 are entered into the evidentiary record.
 - (b) Exhibits CalPA-412 through-416, CalPA-418 through CalPA-450, CalPA-452, CalPA-454, and CalPA-456 through CalPA-466 are not entered into the evidentiary record.
- III. The Motion for Entering Exhibits into the Record filed by SoCalGas on March 18, 2022 is granted in part, and denied in part.
- (a) Exhibits SoCalGas-06, SoCalGas-07, SoCalGas-170 and SoCalGas-175 are entered into the evidentiary record.
 - (b) Exhibits SoCalGas-17, SoCalGas-18, SoCalGas-168, SoCalGas-169, SoCalGas-171 through SoCalGas-174 and SoCalGas-176 are not entered into the record.
 - (c) The SoCalGas request to enter all documents filed in this proceeding into the evidentiary record is denied, with the exception of three specific filings and their attachments, which relate closely to SoCalGas-175 and will be entered into the evidentiary record. These are:
 - SED-333: SED's response to SoCalGas's September 3, 2021 filing as requested by the ALJs' August 10, 2021 Ruling (dated September 23, 2021), Filing and Exhibit A declaration of Randy Holter only;
 - SED-334: SED's Filing in compliance with the ALJs' Ruling addressing two motions to compel (December 8, 2021), filing and declaration of Mahmoud Intably only; and
 - SED-335: SED's compliance filing in response to the February 2, 2022 Ruling (dated February 14, 2022) filing and all attached exhibits, including Exhibit C: Declaration of Terence Eng.
3. In addition, the ALJs established the following schedule for opening and reply briefs for this phase of the proceeding with no extensions granted:

- Opening briefs – May 9, 2022
- Reply briefs – May 31, 2022

- April 15, 2022:

SoCalGas filed a motion asking the ALJs to order SED to serve and enter an unredacted copy of Exhibit SED-324. On April 18, 2022, the ALJs ruled that the version of Exhibit SED 324 that was entered into the evidentiary record should include the full and unredacted version of data request 168 and SED shall serve a compliant version of Exhibit 324 within seven days of this Ruling. On April 19, 2022, SED served SoCalGas with an amended version of Exhibit SED-324.

- April 25, 2022:

SoCalGas filed a motion for discovery sanctions seeking dismissal of all Phase 1A violations as a result of SED's alleged failure to comply with the ALJs' rulings regarding discovery requests.

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 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 March 2022, the Utility companies filed their required MHP-UCP Annual Reports, which tracks (among other things) the numbers of MHP spaces converted to direct service to gas and electric, both to the meter (TTM) and beyond the meter (BTM), and the cost of those conversions, as described in the table below.

Utility	Electric Spaces Converted (TTM)	Electric Spaces Converted (BTM)	Gas Spaces Converted (TTM)	Gas Spaces Converted (BTM)	Total Cost
Bear Valley Electric	0	0	n/a	n/a	\$0
Liberty Electric	0	0	n/a	n/a	\$0
PacifiCorp	0	0	n/a	n/a	\$0
PG&E	897	809	897	809	\$27,757,049.60
SCE	1,274	1,264	n/a	n/a	\$19,337,399
SoCal Gas	n/a	n/a	2,011	1,560	\$20,180,138
SDG&E	2,848	2,750	3,010	2,874	\$79,909,089
SWG	n/a	n/a	58	56	\$506,361

The full reports can be found on the MHP-UCP webpage: <https://www.cpuc.ca.gov/regulatory-services/safety/mhp/mobilehome-park-utility-upgrade-program>

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 ordered several shareholder-funded gas and electric System Enhancement Initiatives. On August 21, 2020, SED selected a consultant for the Compliance and Ethics Corrective Action Program Audit. On October 15, 2020, SED selected a consultant for the Locate and Mark Compliance Audit and the Locate and Mark Field Audit. On November 17, 2020, PG&E submitted its proposed methodologies for SED’s review and approval. On January 12, 2021, SED responded to PG&E’s proposed methodologies review request. On February 4, 2021, PG&E informed SED about a request from its 3rd Party consultant for the Locate and Mark Field Audit to solicit input from another external party (Exponent) to further develop its sampling methodology. SED responded on February 4, 2021. PG&E submitted its first Locate and Mark Annual Report in accordance with Commission Decision (D.) 20-02-036 on April 26, 2021.

On June 4, 2021, the Locate and Mark Field Audit consultant submitted their methodology and SED approved this proposed methodology on July 13, 2021. The Locate and Mark Field Audit consultant has performed a pilot Locate and Mark Field Audit and implemented some improvements to the program that are described in a letter submitted to SED on August 25, 2021. On September 16, 2021, the Locate and Mark Field Audit consultant provided SED with the format of the Semi-Annual Report for the compliance audit using field reviews of a random sampling of gas and electric Locate and Mark tickets. On October 15, 2021, PG&E shared with SED its Enhanced Review of Cultural Survey Results, and the Compliance and Ethics Corrective Action Program Audit consultant also provided their audit reports to SED and PG&E. On December 20, 2021, PG&E met with SED to inform it of the status of the Locate and Mark OII Settlement implementation plan. On January 13, 2022, PG&E provided its response to the reports issued by the independent consultant on the results of their review of PG&E’s Corrective Action Program (CAP) and Compliance and Ethics Helpline Program. According to its response, PG&E plans to implement all nine CAP-related recommendations by 2023 and all Helpline-related recommendations. On January 19, 2022, the Locate and Mark Field Audit consultant notified SED that they have implemented some additional improvements to the program. On February 17, 2022, the Locate and Mark Field Audit consultant submitted the Semi-Annual Report. On April 25, 2022, PG&E submitted its Locate and Mark Annual Report. The reporting period for this Annual Locate and Mark Report is January 1, 2021 through December 31, 2021.

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. April 2022 activities are below and include:

- Conducted 1 Electric Distribution audit, 4 Substation audits, 1 Transmission audit, and 1 Power Plant audit.
- Issued 1 Substation audit report, 3 Communication Infrastructure Provider (CIP) audit reports, and 1 Transmission audit report.

- 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 April 2022, ESRB monitored the status of 15 planned outages and 18 forced outages reported by natural gas and renewable energy power plants.

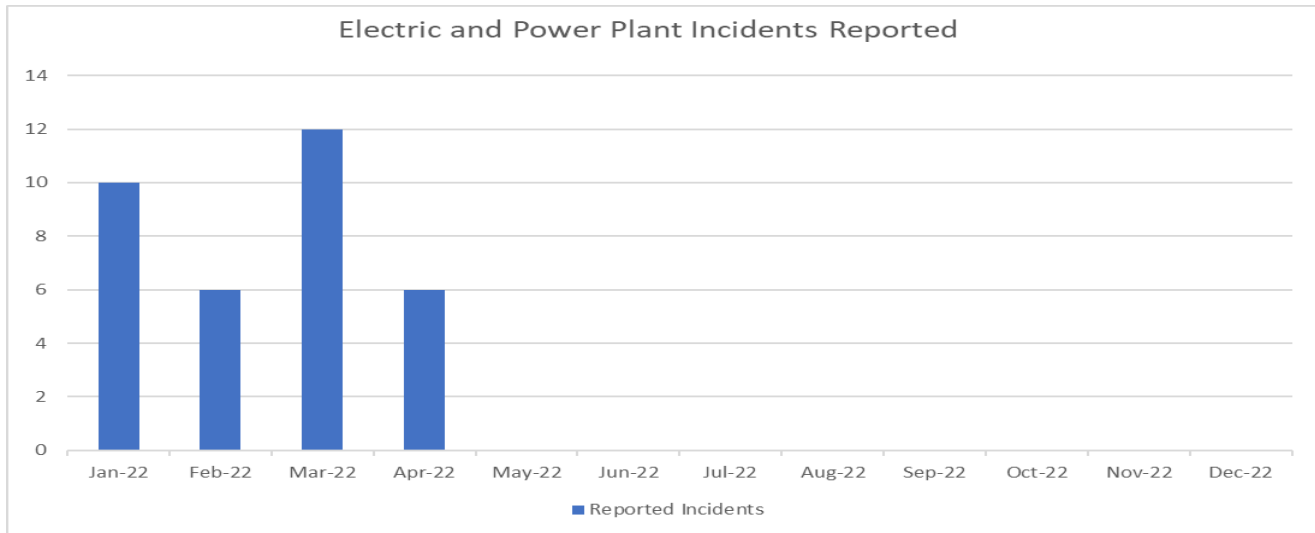
Electric Facilities Citations

SED has the authority to issue citations with penalties for electric utilities and Communication Infrastructure Providers (CIPs) for violating Commission General Orders and 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 SED in 2020 and 2021. All SED 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.16-09-055E.20-12-001	SCE	\$1,000,000	GO 128, Rules 17.1 and 17.7., and PU Code, Section 451	12/4/2020	Failure to properly mark the location of SCE’s underground facilities which resulted in one injury	Paid in January 2021
D.16-09-055 E.21-11-001	PG&E	\$5,000,000	Public Utilities Code (PU Code), Section (§) 451, and General Order (GO) 95, Rules 18, 31.1, and 31.2	11/22/2021	Inadequate inspections of the Ignacio-Alto Sausalito transmission lines	Paid in December 2021
D.16-09-055 E.21-11-002	PG&E	\$2,500,000	General Order (GO) 165, III. Distribution Facilities B. Standards for Inspection	11/22/2021	Incomplete detailed inspection of distribution poles	Paid in December 2021

Electric and Power Plant Incidents Reported in April 2022

ESRB received 5 electric incident reports and 1 power plant incident report in April 2022.



Electric Facilities and Power Plant/Generation Incident Investigations

Incident status		Level 1	Level 2	Level 3	Level 4	Total ²
Total open incidents	Electric Facilities	4	10	56	53	123
	Generation	1	1	5	1	8
Total incidents reported in 2022	Electric Facilities	2	2	18	11	33
	Generation	0	0	1	0	1
Total incidents closed in 2022	Electric Facilities	3	6	22	18	49
	Generation	1	0	3	1	5
Total open 2022 incidents	Electric Facilities	0	1	18	11	30
	Generation	0	0	1	0	1
Incidents reported in April 2022	Electric Facilities	0	1	3	1	5
	Generation	0	0	1	0	1
Incidents closed in April 2022	Electric Facilities	1	0	6	2	9
	Generation	1	0	0	0	1

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).

The above table shows information about ESRB incident investigations as of April 30, 2022, and incidents reported and closed in April 2022. 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 21 electric and communication safety and reliability customer complaints in April 2022.

Notice of Violation Letters

ESRB issued 3 Notice of Violation (NOV) letters in April 2022. 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

PG&E Locate and Mark Practices OII (I.18-12-007) (Commissioner Rechtschaffen/ALJ Allen) (SED Advocacy): Decision 20-02-036 approved several shareholder-funded gas and electric System Enhancement Initiatives but with a longer compliance audit period of four years and a \$110 million total penalty. In November 2020, ESRB staff reviewed PG&E's One Call Concepts Timely Ticket Review Methodology and PG&E's Field Review Methodology and provided comments to GSRB for consideration. On June 4, 2021, ICQ Professionals, LLC, submitted "Proposed Objectives, Methodology and Final Report Description for SED Consultation of Field Audits for Locate and Mark OII I.18-12-007 Settlement". This submittal starts the process of consulting with the CPUC/SED on the objectives, methodology, and the final product description of the Field Audit of PG&E's Locate and Mark Program by ICQ Professionals, LLC. The primary focus is to provide the sampling methodology that will be used to conduct this audit. In September, ESRB reviewed ICQ Professionals, LLC's field audit report. In January 2022, ICQ Professionals, LLC, revised and improved its field audit methodology for PG&E's Locate and Mark Program. No significant updates in April 2022. Pending.

SCE Appeal of Twentynine Palms Citation (K.18-03-008) (ALJ Kim) (SED Advocacy): ESRB investigated an incident that occurred on August 1, 2015, in Twentynine Palms. On February 12, 2018, SED issued a \$300,000 citation to SCE for violations related to the incident. SCE appealed the citation on March 14, 2018. On October 3, 2018, SED issued an \$8,000,000 amended citation that replaced the \$300,000 citation. The amended citation was the result of new violations. Hearings were held in December 2018, February 2019, and March 2019. Briefs and reply briefs were filed in April 2019. Awaiting a draft Resolution on the Twentynine Palms incident. 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 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 Friday, March 25, 2022, the IOUs filed Tier 2 advice letters (AL) that describe the specific format by which pole attachers shall submit their pole attachment data to the IOUs' database systems, and the expected timeline for implementation of IOU database systems. SED and other interested parties will have 20 days from March 25 to file a protest or comments. SED will review the ALs to determine if and how it will respond. SED reviewed Pole OII/OIR Track 2, Phase 1 Tier 2 advice letters (ALs) filed on March 25th, 2022, that describe the specific format by which attachers shall submit pole attachment data. SED opted not to file comments since the ALs are not related to any specific safety issue. Pending.

Physical Security of the Electric System and Disaster and Emergency Preparedness (R.15-06-009) (Commissioner Rechtschaffen/ALJ Kelly) (SED Advocacy): On May 22, 2015, the Commission issued an OIR regarding policies and regulation of physical security for electric supply facilities and to establish standards for disaster and emergency preparedness plans. This rulemaking was conducted in two phases. Phase I addressed physical security for electric supply systems and was resolved by Decision (D).19-01-018. Phase II addresses disaster and emergency preparedness plans for electrical corporations and regulated water companies.

On July 1, 2020, the Safety Policy Division (SPD) submitted a letter dated June 26, 2020, from the Deputy Executive Director of SED and SPD to enact the Interim Trial Procedures (ITP) to allow Commission staff to receive major utility compliance deliverables. On July 10, 2020, the six IOUs submitted their Preliminary Assessments under the ITP process to SPD and subsequently presented their briefings regarding their Preliminary Assessment submissions to SPD and SED staff. Three IOUs submitted supplemental filings and met with SED and SPD to discuss their filings.

On November 19, 2020, the Commission issued D. 20-11-048 which extended the statutory deadline for Phase II to May 30, 2021. On May 21, 2021, the Commission issued D. 21-05-019 which updates electric utilities' emergency plans under General Order (GO) 166 and for water utilities, under GO 103-A. Decision 21-05-019 incorporates requirements from PU Code 768.6 in Standard 14 of GO 166. The IOUs' Final Security Plans and the Publicly Owned Utilities' (POU) Notice of Final Plan Adoption were due July 2021, 30 months after the adoption of D. 19-01-018. The Security Plans and Notices would be submitted to SPD. The most recent decision, D. 21-05-019, left the proceeding open to address the Petition for Modification that was filed concerning D. 19-01-018 (Phase I Decision) in this proceeding. In addition, D.21-05-019 changed the annual deadline for electric utilities' GO 166 annual reports to April 30. The IOUs submitted their annual reports to SPD for review. Pending.

Other ESRB Activities

- **Citations:** ESRB issued no citations in April 2022.

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. In March, SED reviewed DMA’s draft Phase 1 Audit Report and provided comments to DMA.

In April 2022, ESRB provided edits and comments on the draft Transmission and Distribution (T&D) audit report written by DMA, a third-party consultant. SED will also request a meeting with DMA and Safety Policy Division to review SED’s feedback and propose a strategy for DMA to develop a more thorough report that details line-item conclusions and recommendations. Following this meeting, SED plans to meet with DMA and SPD to update PG&E on the plan to revise the T&D audit report. Pending.

Compliance with D. 17-09-024 regarding Long Beach Incident: Decision 17-09-024 adopted a Settlement Agreement between SCE and SED. Under the Agreement, SCE paid a \$4 million penalty and will spend \$11 million on various system enhancement projects in Long Beach intended to reduce the chance of public injury, reduce the risk of future system failures, and improve the utility’s operational awareness and network maintenance. ESRB is monitoring SCE’s work to ensure compliance with the Settlement Agreement.

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. On April 21, 2022, the California Independent System Operator (CAISO) hosted the Transmission Maintenance Coordination Committee (TMCC) meeting. TMCC members discussed the Transmission Maintenance Program audit reports, operation of photovoltaic (PV) and inverter-based resources, and new transmission projects in California.

WILDFIRE SAFETY AND ENFORCEMENT BRANCH (WSEB)

SED’s 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. April 2022 activities for WSEB include:

- Currently investigating eleven (11) utility-related wildfires. No fire investigations were completed in April 2022.
- No PSPS events in April 2022.
- Participated in SCE, Bear Valley, and PacifiCorp PSPS exercises.
- Continued monitoring and coordinating SCE’s 2020 PSPS Corrective Action Plan implementation.

PSPS Activations, De-energizations & Post Event Reports - April 2022

WSEB	PG&E	SCE	SDG&E	Bear Valley	Pacific Corp	Liberty
Total PSPS Activations	0	0	0	0	0	0
Total PSPS w/ De-energization	0	0	0	0	0	0
Total PSPS Post Event Reports Reviewed	0	0	0	0	0	0

PSPS Related Proceedings

Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions (R.18-12-005) (President Batjer/ALJ Poirier /ALJ Stevens/ALJ Kao/ALJ DeAngelis) (SED Advisory):

This OIR was opened to further examine policies and guidelines adopted in ESRB-8 regarding communication, notification, mitigation and other logistic and implementation issues of a PSPS event. Currently, there are two tracks in this OIR:

1. Continued examination of utility de-energization/PSPS practices and guidelines.
2. An Order to Show Cause (OSC) for why PG&E should not be sanctioned for violations of P.U. Code 451, D.19-05-042 (Phase I) and ESRB-8 concerning three PSPS events in Fall 2019. Briefs were filed in 2020 and the Presiding Officer’s Decision (POD) was issued on May 26, 2021.

The POD penalizes PG&E \$106.003 million for its flawed implementation of the Fall 2019 PSPS events, offset by bill credits PG&E has already provided to customers. The penalty includes a PG&E shareholder contribution of \$1.418 million to provide qualifying customers access to backup portable

batteries, a bill credit to the general group of customers in the areas affected by the Fall 2019 PSPS events and to the Medical Baseline customers in those affected areas. PG&E and California Large Energy Consumer Association (CLECA) filed appeals of the POD on June 25, 2021; both were denied.

3. On February 19, 2021, the ALJ issued a Phase 3 Scoping Memo and Ruling to consider whether existing de-energization guidelines (Phase 2) should be further updated, or if new guidelines should be adopted in advance of the 2021 wildfire season. Comments and reply comments were submitted in March 2021.

On June 24, 2021, the Commission approved and adopted the Proposed Decision's Phase 3 PSPS Guidelines (D.21-06-034). A link to the Phase 3 Guidelines is [here](#).

4. On September 23, 2021, the Commission adopted D.21-09-026 (the Modified Presiding Officer's Decision) that found violations including failure of PG&E's website, which was unavailable or non-functional during significant portions of the PSPS event; inaccurate online outage maps; inaccessible secure data transfer portals to its public safety partners; and failure to provide advanced notification of de-energization events to approximately 50,000 customers and 1,100 Medical Baseline customers during the three PSPS events in Fall 2019.

The Commission penalized PG&E \$106.003 million to deter future violations and demanded accountability for PG&E's flawed implementation of the Fall 2019 PSPS events. The penalty will be offset by \$86 million for bill credits PG&E has already provided to some electric customers in 2019. The net penalty assessed on PG&E is \$20.003 million.

The penalty also includes a PG&E shareholder contribution of \$1.418 million to PG&E's Disability Disaster Access & Resources Program, which provides qualifying customers access to backup portable batteries through grant, lease-to-own, or low-interest loan options; a PG&E shareholder-funded bill credit of \$12.185 million extended to all electric customers in the geographic areas affected by the Fall 2019 PSPS events; and a PG&E shareholder-funded bill credit of \$6.4 million to the Medical Baseline customers in the geographic areas affected by the Fall 2019 PSPS events.

5. On April 29, 2022, in compliance with D.21-06-034, SED issued the approved template for the IOUs' annual PSPS Pre-Season reports. The first annual PSPS Pre-Season reports are due July 1, 2022.

PSPS Order Instituting Investigation (I.19-11-013) (Commissioner Batjer/ALJ DeAngelis) (SED Advisory). This Investigation was initiated to determine whether the IOUs that experienced PSPS events in late 2019 prioritized safety and complied with the Commission's regulations and requirements in ESRB-8 and Decision (D).19-05-042 (Phase 1 PSPS Guidelines). A Proposed Decision was issued for public comment on April 20, 2021, with comments due May 10, 2021. On June 7, 2021, D.21-06-014 was approved by the Commission. On July 7, 2021, the Acton Town Council filed a Rehearing Request which reopened this proceeding.

In compliance with Ordering Paragraph 61 of D.21-06-014 of this Investigation, and D.19-05-042 in Rulemaking 18-12-005, SED prepared and sent out a draft template on July 7, 2021, for use by electric investor-

owned utilities when submitting post-event reports and lessons learned following a Public Safety Power Shutoff (PSPS). Comments were due August 6, 2021. Staff completed comment review in September and revised the draft template based on comments. The final approved template was issued on October 18, 2021.

The IOUs used the approved template to submit their 2021 Post-Event Reports to the CPUC which are posted on the CPUC website at <https://www.cpuc.ca.gov/consumer-support/psps/utility-company-psps-reports-post-event-and-post-season>.

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 April 2022, no (0) whistleblower complaints were submitted online to SED.

SED received four (4) inquiries from the Safety Hotline inbox.