



SAFETY AND ENFORCEMENT DIVISION
MONTHLY PERFORMANCE REPORT

October 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. October 2024 external activities included:

- Discussion about Line 6916 – SoCalGas and CPUC/ Energy Division
- Discussion about Plastic Pipe Replacement Program in General Rate Case – SoCalGas/SED

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.

KUDOS

On August 19, 2024, the Pipeline and Hazardous Materials Safety Administration (PHMSA) sent results to President Alice Reynolds of its evaluation of the pipeline safety program activities carried out by GSRB in Calendar Year 2023. PHMSA reviewed documents, pipeline program procedures and records, and observed an on-site pipeline operator inspection by GSRB staff on July 9-11, 2024.

Federal law authorizes PHMSA to monitor state pipeline safety programs. This annual evaluation ensures compliance with the Pipeline Safety Act requirements which provides the basis for determining the state's pipeline safety grant allocation.

For CY 2023, GSRB scored 99 out of 100 points, its highest score in the past three years.

PHMSA noted that because the California pipeline safety program is large with many operators, the ability to manage compliance issues is more difficult to manage manually. PHMSA “strongly encouraged” GSRB to upgrade to an electronic system for tracking open violations to closure to close a process gap and enhance program reliability. SED is currently competing for ITSD funding for an electronic system.

In the area of transparency, the Pipeline Safety Trust, which annually reviews each state’s pipeline safety website to assess its accessibility and the amount of information available to members of the public,

awarded California (GSRB) a perfect score. It stated, “This state excels in transparency regarding the agency’s authority. This helps the public understand the state pipeline safety program’s jurisdiction and the issues it addresses.” California was one of five states to score 100%.

Congratulations GSRB! Find more information about GSRB [here](#).

Natural Gas Inspections (Year to Date)

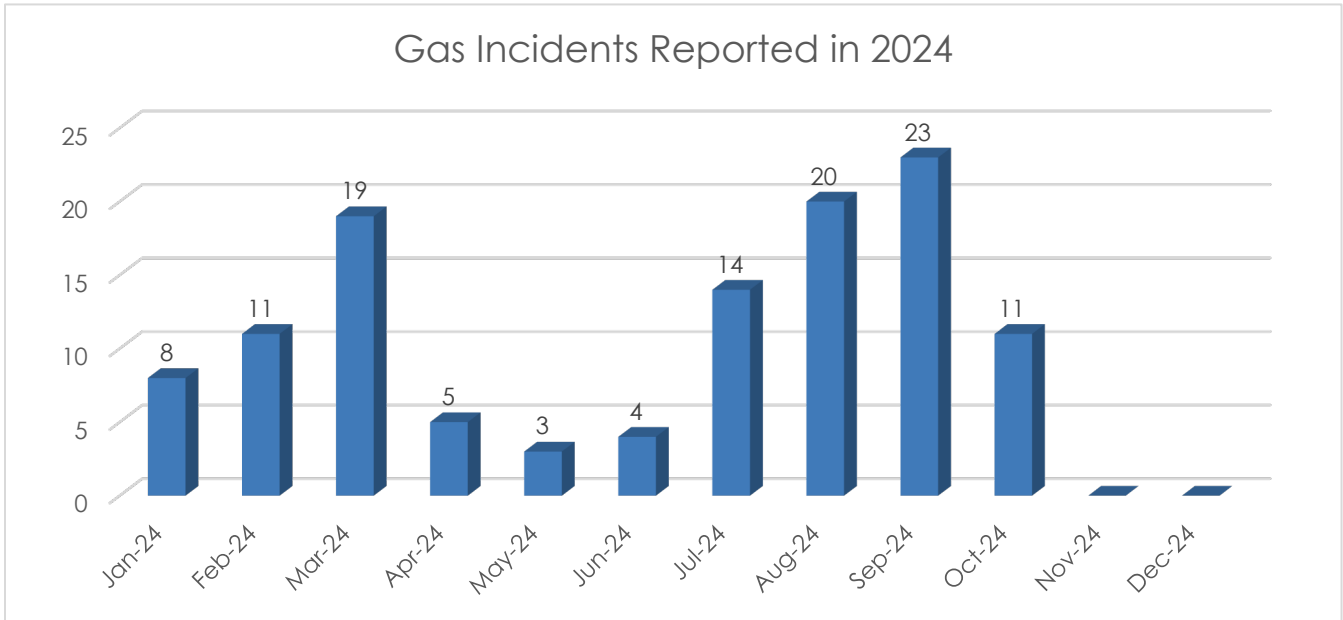
The purpose of GSRB’s inspections is to confirm that operators continue to construct, operate, and maintain their pipeline facilities in a manner that ensures the safety of workers and the public. In addition to routine inspections, GSRB also conducts on-site construction inspections. Typically, each 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 October 2024
Conducted	41
Final Report Completed	25

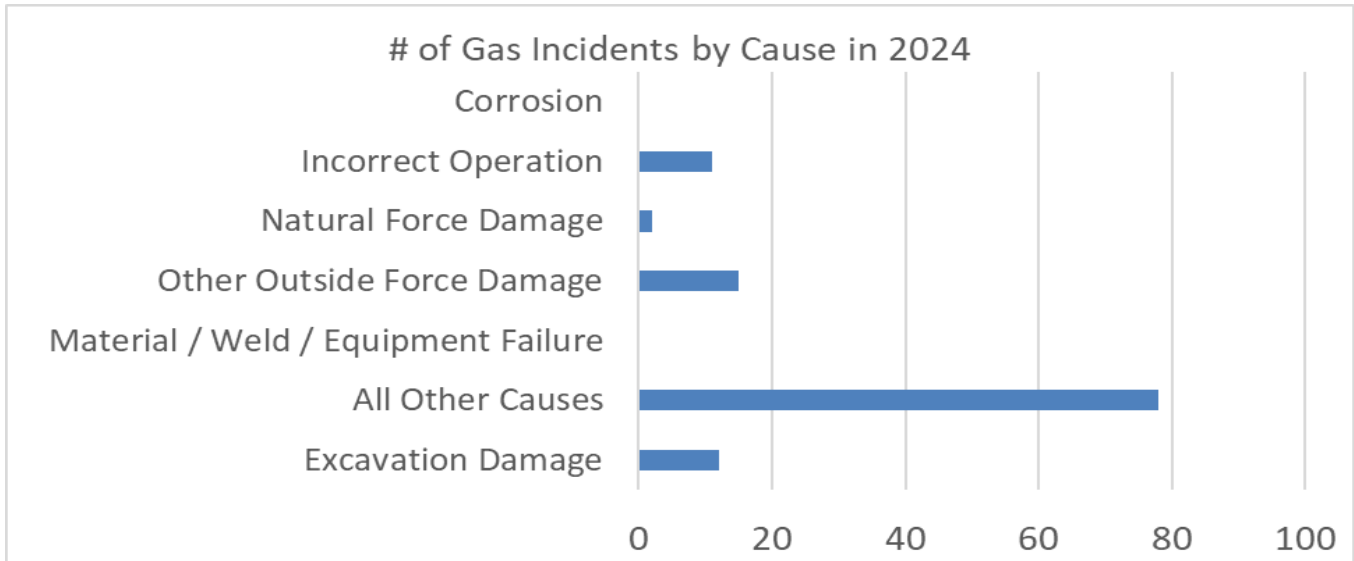
Natural Gas Incident Reports and Investigations through October 2024

As of October 31, 2024, GSRB Staff has received reports of 118 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 table below illustrates the number of reported gas incidents per month, ending October 2024.



The bar chart below shows the 118 incidents by cause as of October 2024



The table below shows the 118 incidents by incident level and status.

Status	Level 1	Level 2	Level 3	Level 4	TOTAL
Open	1	11	8	1	21
Closed	79	12	5	1	97
TOTAL	80	23	13	2	118

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 October 2024.

Customer Safety Complaints

GSRB received and investigated four (4) new customer complaints and inquiries in October.

The four (4) complaints are being investigated and listed as: 1) a customer inquiry to relocate their gas service and meter, 2) a customer complaint about IOU gas service restoration, 3) a public complaint about an IOU’s aboveground pipeline, and 4) a whistleblower complaint regarding an IOU’s emergency response process.

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 October, GSRB issued three inspection notices and one NOPV letter.

- October 1 – Southwest Gas Material Traceability inspection letter – 0 probable violations found.
- October 1 – SoCalGas Southeast – Orange County Coast inspection letter – 0 probable violations found.
- October 9 – Southwest Gas Distribution Integrity Management Program inspection letter – 0 probable violations found.
- October 17 – PG&E Stockton Division inspection letter – 6 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 number 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
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. As of January 1, 2024, 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](#).

Decision 20-04-004 requires a second application period between January 1 and March 31, 2025. GSRB is currently reaching out to potential applicants to educate them on the process and alert them to the new application periods.

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.

On September 24, 2024, PG&E indicated that they have implemented several process improvements on classification of locate and mark tickets.

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. October 2024 activities are below and include:

- Conducted 6 Electric Distribution audits, 2 Communication Infrastructure Provider (CIP) audits, 3 Substation audits, and 2 Power Plant audits.
- Issued 3 Electric Distribution audit reports, 2 CIP audit reports, 1 Substation audit report, and 1 Power Plant 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 October 2024, ESRB monitored the status of 32 planned outages and 100 forced outages reported by natural gas and renewable energy power plants.

Electric Facilities Citations

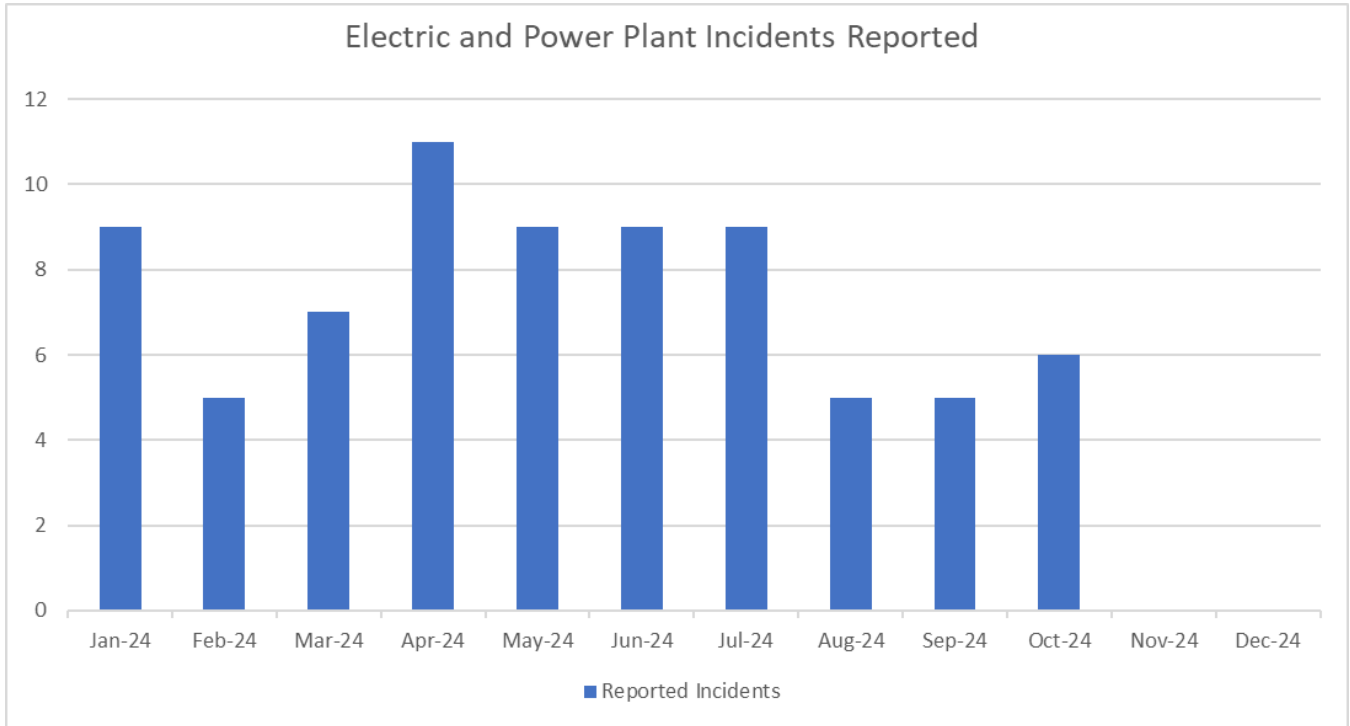
SED has the authority to issue citations with penalties for electric utilities and Communication Infrastructure Providers (CIPs) for violating Commission General Orders (GO) and Public Utility Code (PU Code) rules. Citations may arise from violations discovered during incident investigations, audits, 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 2024. ESRB did not issue any citations 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.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 5 electric incident reports and 1 power plant incident report in October 2024.



Electric Facilities and Power Plant/Generation Incident Investigations

Incident status		Level 1	Level 2	Level 3	Total
Total open incidents	Electric Facilities	31	6	61	98
	Generation	19	0	3	22
Total incidents reported in 2024	Electric Facilities	16	4	38	58
	Generation	19	0	3	22
Total incidents closed in 2024	Electric Facilities	36	17	35	88
	Generation	5	0	1	6

Incident status		Level 1	Level 2	Level 3	Total
Total open 2024 incidents	Electric Facilities	11	3	27	41
	Generation	14	0	2	16
Incidents reported in October 2024	Electric Facilities	2	0	3	5
	Generation	0	0	1	1
Incidents closed in October 2024	Electric Facilities	10	4	9	23
	Generation	3	0	0	3

The table above shows information about ESRB incident investigations as of October 31, 2024, and incidents reported and closed in October 2024.

In August 2024, ESRB revised the definitions of incident levels as follows:

- Level 3 incident (highest level): Incidents that result in a fatality or personal injury/injuries as defined in the electric incident reporting requirement.
- Level 2 incident (medium level): Incidents that are the subject of significant public attention or media coverage and are attributable or allegedly attributable to the utility’s electrical facilities.
- Level 1 incident (lowest level): Incidents that involve damage to property with the amount consistent with the reporting requirement.

All reports of ESRB’s scheduled electric and CIP audits can be found on the ESRB webpage [here](#). All scheduled generation audit reports can be found [here](#).

Customer Safety Complaints

ESRB investigated 21 electric and communication safety and reliability customer complaints in October 2024.

Notice of Violation Letters

ESRB issued one Notice of Violation (NOV) letter in October 2024. ESRB may issue an NOV in response to an investigation or customer complaint for a violation of an applicable law or regulation. For incidents that ESRB investigated that do not result in an NOV or other enforcement action, ESRB will issue a Closure Letter to the utility. All ESRB Closure Letters can be found on the Commission’s website [here](#).

Electric Safety and Reliability: Proceedings

Rulemaking to Update Rules for the Safety, Reliability, and Resiliency of Electrical Distribution Systems (R.24-05-023) (Commissioner Baker/ALJ Rizzo) (SED Advocacy): On June 6, 2024, the Commission issued a Rulemaking to consider changes to existing policies, procedures, and rules regarding the safety, reliability, and resiliency of electrical distribution systems. The Commission identified four points as the preliminary scope of issues for this proceeding: 1) Reliability of Electrical Distribution Service, 2) Outage Transparency for Customers, 3) Supporting Short-term Reliability, Safety, and System Resilience, and 4) Reasonableness of Costs and Cost Allocation. The Commission included a set of questions to be addressed and answered by participating parties.

In June 2024, SED reviewed the Rulemaking and filed comments on July 8, 2024. Reply comments were due on July 23, 2024.

In October 2024, the Commission issued a Scoping Memo and Ruling setting forth the issues, need for hearing, schedule, category, and other matters necessary to scope this proceeding. Pending.

Rulemaking to Consider Proposed Changes to General Order 95 to Modernize the Rules and Regulations Governing the Design and Construction of Overhead Electric and Communications Facilities in California (R.24-10-005) (Commissioner Baker/ALJ Rizzo) (SED Advocacy)

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 into 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.

On September 11, 2024, SCE filed supplemental comments which solicited the Commission to consider including/discussing modifications to GO 95 Rule 18 within the scope of the proceeding. On September 13, 2024, SED filed a Response to SCE's supplemental comments to request that the Commission not consider SCE's filing because the timeframe for comments had elapsed in mid-July. Alternatively, SED asked the Commission to provide an opportunity for all parties to respond if the Commission intends to allow SCE's supplemental comments.

On October 22, 2024, the Commission issued a Rulemaking, R.24-10-005, granting SCE's petition. The Rulemaking included a set of questions for all participating parties. SED is in the process of submitting comments on the Rulemaking.

Other ESRB Activities

Senate Bill (SB) 1383 Implementation: On March 26, 2024, ESRB hosted the first of three technical workshops to present a walkthrough of its proposed revisions to General Order (GO) 167-B to implement operation and maintenance standards for energy storage systems as required by Senate Bill 1383. After receiving feedback from workshop participants, ESRB held a second workshop in May 2024, attended by Generator Asset Owners (GAOs) and other stakeholders.

On August 23, 2024, ESRB hosted its third and final workshop on SB 1383 implementation. After considering all the feedback and recommendations from workshop participants, ESRB is now making the final revisions to GO 167-B to reflect the requirements of SB 1383 and plans to release a draft resolution of these modifications for public comment in the coming months. All workshop presentations and materials are posted on the CPUC Electric Generation Safety and Reliability webpage [here](#).

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 October 17, 2024, ESRB attended a meeting of the Transmission Maintenance Coordination Committee (TMCC). During the meeting, the IOUs continued to advocate to change the requirement for Level 3 maintenance tags (a requirement in GO 95) to be categorized as opportunity maintenance. Another topic discussed at the meeting was PG&E's ongoing developments for new methods to employ greener technology into their facilities. Specifically, PG&E reviewed their usage of natural ester in lieu of mineral oil within utility scale transformers.

Summer Reliability

Each summer, ESRB implements its Summer Reliability Operating Procedure to assist the CPUC and other agencies in ensuring electric generation reliability from June 1st through October 31st. ESRB's Summer Reliability activities have concluded for Summer 2024. ESRB will resume its summer reliability program in April 2025 with the Summer Reliability Data Request and Daily Summer Outage Monitoring that begins in June 2025.

For further information, see webpage link [here](#).

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.

October 2024 activities for WSEB:

- Currently investigating 12 utility-related wildfires
- Monitored five PSPS events in October 2024: SCE on October 2, 9, 17, and 27, 2024, and PG&E on October 17, 2024
- Reviewed PG&E’s July 5, 2024, and SCE’s July 26, 2024, PSPS Post Event Reports

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

PSPS Activities	PG&E	SCE	SDG&E	Bear Valley Electric	PacifiCorp	Liberty Utilities
Total PSPS Activations	1	4	0	0	0	0
Total PSPS w/De-energizations	1	3	0	0	0	0
Total PSPS Post Event Reports Reviewed	1	1	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
SCE 2020 PSPS Events	Administrative Enforcement Order	Resolution ALJ-440	SCE	\$7,000,000	06/08/2023
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
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	04/22/2024
SDG&E 2021 PSPS Events	Administrative Consent Order	Resolution SED-9	SDG&E	\$70,830	08/01/2024
PacifiCorp 2021 PSPS Events	Administrative Consent Order	Resolution SED-10	PacifiCorp	\$18,030	08/01/2024

PSPS-Related Proceedings and Events

In August 2024, the CPUC continued to hold utilities accountable for conducting safe and appropriate PSPS events by requiring the electric IOUs to publicly present on lessons learned from PSPS events in 2023 and preparedness for PSPS events in 2024.

Liberty Utilities, PacifiCorp, and SCE presented on August 7; SDG&E, Bear Valley Electric Service, and PG&E presented on August 8. The electric utilities provided updates on the status of preparation efforts and coordination with public safety partners, critical infrastructure and facilities, and customers, including those most vulnerable and/or with access and functional needs. The utilities presented on efforts to mitigate customer impacts and identified changes to processes or operations in 2024 based on lessons learned. The presentation from each electric IOU can be found [here](#).

On August 6, 2024, the Center for Accessible Technology (CforAT) filed a Motion requesting the Commission issue an Order to Show Cause (OSC) against SCE for its substantial notification failures during PSPS de-energization events that took place during the 2023 wildfire season. CforAT cited two distinct but related categories: (1) notification failures affecting customers, critical facilities and infrastructure operators, and public safety partners; and (2) issues with public safety partner notification emails. On August 21, 2024, SCE filed a response opposing the Motion. On August 26, 2024, Public Advocates Office (PAO) filed comments in support of the Motion.

On September 3, 2024, CforAT filed reply comments to SCE's response.

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 that 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 (SED) staff met with representatives from the Joint Parties to listen to their concerns and their recommendations.

On February 23, 2023, President Reynolds issued a Ruling responding to the July 12, 2022 Joint Parties' Motion. The Ruling 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 propose a 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.

Protective Equipment and Device Settings (PEDS)

PG&E, SCE, and SDG&E have adjusted "fast trip" settings, also known as Protective Equipment and Device Settings (PEDS), 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 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 October 2024, five whistleblower submissions and five safety hotline inquiries were sent online to SED.