

SAFETY AND ENFORCEMENT DIVISION MONTHLY PERFORMANCE REPORT

October 2025



Disclaimer

This Report was prepared by California Public Utilities Commission (CPUC) staff. It does not necessarily represent the views of the CPUC, its Commissioners, or the State of California.

The CPUC, the State of California, its employees, contractors, and subcontractors make no warrants, expressed or implied, and assume no legal liability for the information in this Report.

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.

Contents

Introduction	1
Gas Safety and Reliability Branch (GSRB)	2
Natural Gas Inspections (Year to Date)	
Natural Gas Incident Reports and Investigations through September 2025	
Natural Gas Utility Self-Identified Violation (SIV) Investigations	4
Customer Safety Complaints	4
Inspection Notices / Notice of Probable Violation Letters (NOPV)	5
Natural Gas Safety and Reliability Proceedings	5
Electric Safety and Reliability Branch (ESRB)	8
Electric Facilities Citations	8
Electric and Power Plant Incidents Reported	9
Customer Safety Complaints	10
Notice of Violation Letters	10
Electric Safety and Reliability: Proceedings	10
Other ESRB Activities	13
Summer Reliability	13
Wildfire Safety and Enforcement Branch (WSEB)	16
PSPS Activities in September 2025	16
WSEB Wildfire and PSPS Enforcement Actions to Date	16
PSPS-Related Proceedings and Events	18
Protective Equipment and Device Settings (PEDS)	20
Monitoring the Whistleblower Website and Safety Hotline	21

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.

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.

SED (GSRB) did not issue any citations in October. More information about previous gas citations can be found on the CPUC's website <u>here</u>.

More information about GSRB can be found here.

Natural Gas Inspections (Year to Date)

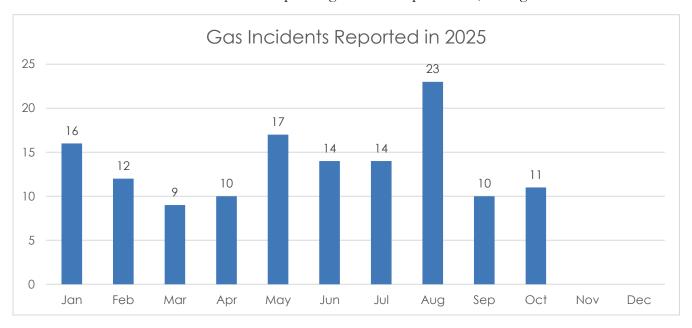
The purpose of GSRB's inspections is to confirm that operators continue to construct, operate, and maintain their pipeline facilities in a manner that ensures the safety of workers and the public. In addition to routine inspections, GSRB also conducts on-site construction inspections. Typically, each 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 2025.

Inspections	Year to date, through October 2025
Conducted	38
Final Report Completed	35

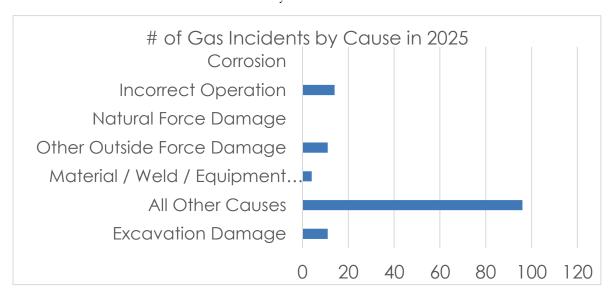
Natural Gas Incident Reports and Investigations through October 2025

Operators report incidents based on the criteria outlined in GO 112-F. All reported incidents are assigned to GSRB engineers to investigate and prepare a final investigation report. The final investigation report indicates whether there were any violations of General Order (GO) 112-F committed by the operators. As of September 30, 2025, GSRB Staff received 136 incident reports from gas operators.

The table below illustrates the number of reported gas incidents per month, ending October 2025.



The bar chart below shows 136 incidents by cause as of October 2025.



The table below shows the 136 incidents by incident level and status.

Status	Level 1	Level 2	Level 3	Level 4	TOTAL
Open	1	14	11	0	25
Closed	87	9	14	0	110
TOTAL	87	23	25	0	136

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 2025.

Customer Safety Complaints

GSRB received and investigated five (5) new customer complaints and two (2) new inquiries in October 2025.

Of the cases, one (1) complaint was closed after GSRB referred the reporting party to more appropriate agencies, three (3) were non-jurisdictional, and the two (2) inquiries were closed without further action after GSRB addressed the questions.

The remaining two (2) complaints are being investigated and listed as: a billing-related concern, and a mobile home park system safety concern.

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 four (4) inspection notices and two (2) NOPV letters.

- October 7 PG&E Non-DOT Gas Incident Q3 letter 2 probable violations found.
- October 13

 Wild Goose Gas Storage Transmission Integrity Management Program inspection letter – 2 probable violations found.
- October 15 SoCalGas Distribution Integrity Management Program inspection letter 0 probable violations found.
- October 15 SDG&E Distribution Integrity Management Program inspection letter 0 probable violations found.
- October 27 PG&E Transmission Integrity Management Program inspection letter 0 probable violations found.
- October 27 SoCalGas and SDG&E Public Awareness Program 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 investor-owned utilities (IOUs) to install new gas and electric utility systems in mobile home parks (MHP) 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.

During the first application period (Jan 1 – Mar 31, 2021), GSRB received forms of intent from 986 mobile home communities. GSRB 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. GSRB delivered the 2021 priority list to the participating IOUs with 1,557 parks, which have a total of approximately 171,000 home spaces.

In February 2025, the utility companies filed their required MHP-UCP Annual Reports, which track (among other things) the number of MHP spaces converted from master-meter service to direct gas and electricity service, where a space is directly served and billed by IOUs, both to the meter (TTM) and beyond the meter (BTM). The cost of those construction projects in 2024 is described in the table below:

Utility	Gas Spaces Installed (TTM)	Gas Spaces Installed (BTM)	Electric Spaces Installed (TTM)	Electric Spaces Installed (BTM)	Total Cost
Bear Valley Electric	n/a	n/a	0	0	\$0
Liberty Electric	n/a	n/a	0	0	\$0
PacifiCorp	n/a	n/a	0	0	\$0
PG&E	1,450	1,430	1,485	1,485	\$62,694,858
SCE	n/a	n/a	2,754	2,672	\$55,122,557
SDG&E	2,061	1,918	1,685	1,641	\$66,513,193
SoCalGas	3,786	3,722	n/a	n/a	\$13,870,513
Southwest Gas	458	446	n/a	n/a	\$3,654,692

Since the beginning of the MHP Utility Conversion Pilot Program in 2015, the utilities have reported installing new electric services to 44,673 spaces and installing new gas services to 51,643 spaces. As of January 1, 2025, the utilities have reported spending \$1.57 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 2024, SED did not authorize any re-prioritization due to extenuating circumstances. The full reports, as well as a list of all reprioritized parks throughout the years of the program, 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 has posted the formal application, called a Form of Intent, on its webpage. In December 2024, GSRB sent applications to 640 potential applicants to educate them on the process and alert them to the new application periods. By the end of the application period, GSRB had received 390 applications to the program, 332 of which indicated their willingness to participate in the program. Some of the applicants were already in the program but provided new information for GSRB's risk analysis model.

GSRB integrated the new applicants into the risk analysis model and updated certain risk data. GSRB delivered the 2025 priority list to the participating investor-owned utilities at the end of June 2025. The newest list includes 1,525 parks, which have a total of approximately 168,400 home spaces.

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

SED MONTHLY PERFORMANCE REPORT

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.

Based on PG&E's Annual Locate and Mark Program Report, PG&E has completed all System Enhancements Initiatives per the Settlement apart from the ongoing Field Compliance Audit. The processes for the ongoing Field Compliance Audit and Staffing have been developed and implemented. PG&E's total contract period with the Field Compliance Audit contractor is scheduled to end in Quarter 3 of 2025.

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 2025 activities are below and include:

- Conducted 3 Electric Distribution audits, 8 Communication Infrastructure Provider (CIP) audits, 2
 Substation audit, 3 Transmission audits, and 2 Power Plant audits.
- Issued 4 Electric Distribution audit reports, 4 CIP audit reports, 1 Transmission audit report, and 1 Battery Energy Storage System audit report.

ESRB reviews daily outage reports from power plants. An outage 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 2025, ESRB monitored the status of 26 planned outages and 101 forced outages reported by natural gas and renewable energy power plants.

Electric Facilities Citations

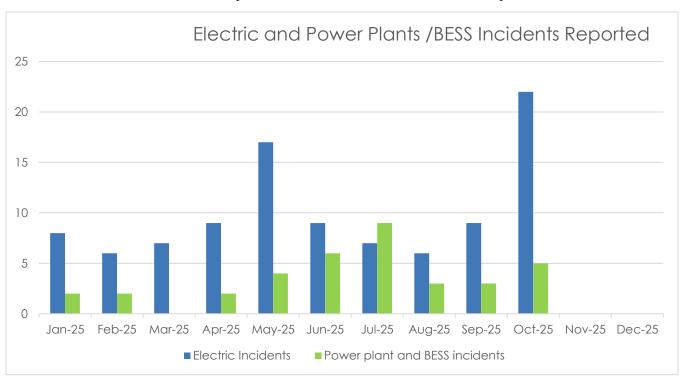
SED has the authority to issue citations with penalties for electric utilities and Communication Infrastructure Providers (CIPs) for violating Commission General Orders (GO) and Public Utility Code (PU Code) rules. Citations may arise from violations discovered during incident investigations, audits, 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 and 2025. All ESRB citations related to electric and communication facilities can be found on the Commission's website <u>here</u>.

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 22 electric incident reports and 5 Power Plant/BESS incident reports in October 2025.



Electric Facilities and Power Plant/BESS Incident Investigations

Incident status		Level 1	Level 2	Level 3	Total
Total open incidents	Electric Facilities	26	18	97	141
	Generation/BESS	43	0	3	46
Total incidents reported in 2025	Electric Facilities	14	13	74	101
	Generation/BESS	33	0	2	35
Total incidents closed in 2025	Electric Facilities	20	2	39	61
	Generation/BESS	8	0	1	9
Total open 2025 incidents	Electric Facilities	12	13	63	88
	Generation/BESS	31	0	2	33

Incident status		Level 1	Level 2	Level 3	Total
Incidents reported in September 2025	Electric Facilities	4	2	16	22
	Generation/BESS	5	0	0	5
Incidents closed in September 2025	Electric Facilities	2	0	2	4
	Generation/BESS	1	0	0	1

The table above shows information about ESRB incident investigations as of October 31, 2025, and incidents reported and closed in October 2025.

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

- <u>Level 3 incident (highest level)</u>: Incidents that result in a fatality or personal injury/injuries as defined in the electric incident reporting requirement.
- <u>Level 2 incident (medium level)</u>: Incidents that are the subject of significant public attention or media coverage and are attributable or allegedly attributable to the utility's electrical facilities.
- <u>Level 1 incident (lowest level)</u>: 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 <u>here</u>. All scheduled generation audit reports can be found <u>here</u>.

Customer Safety Complaints

ESRB investigated 26 electric and communication safety and reliability customer complaints in October 2025.

Notice of Violation Letters

ESRB issued 22 Notice of Violation (NOV) letters in October 2025 to BESS entities. ESRB may issue an NOV in response to non-compliance with a GO, an investigation or customer complaint investigation uncovering 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.

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.

On November 12, 2024, the ALJ issued a Ruling Requesting Draft Proposals from Respondents and Stakeholders Regarding Data Definition and Guideline Enhancements.

Per the Ruling requirement, on December 13, 2024, parties to the proceeding and the electric utilities filed their proposals for Data Definition and Guideline Enhancements pertaining to utility reporting requirements in the areas of outages, reliability, restoration, customer notifications, and other areas.

A workshop to discuss data definition, data reporting, and reliability thresholds took place on February 21, 2025. Key topics were the existing utility reports and general shortcomings of those reports (i.e., data format, data completeness, inability to integrate available data, frequency of reports, and availability of the data to the public). Also discussed were the negative effects of the PSPS program on customers and lack of communication to customers. In response, the CPUC Safety Policy Division (SPD) will develop a staff proposal to integrate data for more accurate analysis, increase transparency for customers, and provide the CPUC with a clear view of the status quo and trends that may impact California's electrical distribution system.

A workshop was held on May 8, 2025, where SPD staff presented their staff proposal for a database of reliability data. Staff solicited feedback from stakeholders in areas such as data governance protocols, data dictionary, and data reporting scheme.

A Ruling was issued on August 22, 2025, to modify the Track 1 Scoping Memo schedule. The Ruling replaced the previous schedule that focused on the Commission staff proposal of a database of reliability data with a new schedule that directs the utilities to develop and solicit feedback on a Joint Reliability Report. During the previous workshop, only the utilities supported the idea of an additional annual report as a method to deliver customer reliability data. Most other parties, including Safety Policy Division staff, anticipated the development of a secure and robust database accessible by the Commission, stakeholders, and to a limited extent, the public. The new guidance provides the utilities with guiding principles, parameters, and other requirements to create the new report. It also requires that the data used to populate the report be made available to Commission staff by secure file transfer.

Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company (Joint IOUs) are preparing a draft Customer Reliability Report Template, which is due October

31, 2025. Following the submission, interested parties will submit comments to the draft by November 14, 2025, and reply comments will be due on December 3, 2025. The most recent ruling issued within the proceeding provided guiding principles/instructions for the IOU to implement within their draft report.

On October 27, 2025, Administrative Law Judge Coline Rizzo issued a ruling to modify the Track 1 schedule. The change in schedule is the result of a request for extension made by the Joint IOUs, in order to solicit feedback from stakeholders and parties for their proposal. Originally the Joint IOU's were required to submit a joint draft customer reliability report template on October 31, 2025, but since the approval of the extension request, the new submission deadline for that template is December 15, 2025. And following that submission date, the opening comments from parties to the proceeding are now due January 9, 2026, with reply comments from the IOU's due January 26, 2026.

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 Joanna Perez-Green) (SED Advocacy)

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 response by all participating parties.

On November 22, 2024, SED submitted its comments on the Rulemaking.

On December 9, 2024, SED submitted its reply comments.

An IOU-led Party Workshop was conducted on January 8, 2025, and the Workshop report was filed on January 17, 2025. In February 2025, all parties, including SED, filed comments and reply comments on the IOU-led Party Workshop.

On April 14, 2025, Commissioner Baker issued a scoping memo and ruling setting forth the issues, need for hearing, schedule, category, and other matters necessary to scope this proceeding.

The first workshop was held on May 28-29, 2025. The primary goal of this workshop was to allow the General Order 95/128 Rules Committee to present their proposal for the structure of future workshops. The petitioner explained the reason for the proposed rule changes and the Committee discussed how future workshops will be conducted.

A final workshop was held on September 30-October 2, 2025. Parties were able to reach an agreement on all the proposed Rule Changes. A Working Group is currently preparing a workshop report to be submitted to the commission/ALJ by November 17, 2025.

Other ESRB Activities

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. At meetingwas held in October 2025, however, ESRB was not able to attend due to a conflicting schedule. The next meetin is scheduled for January 2026.

Summer Reliability

Each summer, ESRB implements its Summer Reliability Operating Procedure to assist the CPUC and other agencies in ensuring electric generation reliability. The primary objective of the Summer Reliability (SR) process is to ensure that Generation Asset Owners (GAOs) and Energy Storage System Owners (ESSOs) conduct ongoing operation and maintenance of their assets in compliance with General Order (GO) 167-C throughout the summer period (June 1st through October 31st). This process is designed to help minimize and prevent electric reliability disruptions and prolonged outages, particularly during peak demand periods.

To achieve this objective, ESRB engages in a series of planning and preparatory activities with GAOs and ESSOs prior to the start of the summer season. These activities include:

1. Summer Reliability Data Request and Analysis

The ESRB Generation team prepares data requests (DRs) for GAOs and ESSOs. These DRs are designed to enhance ESRB's understanding of the preparedness of GAOs and ESSOs to ensure a reliable electric power supply during peak summer demand periods.

This year, the Summer Reliability process has been expanded to include energy storage systems (ESSs), following the adoption of Resolution ESRB-13 on March 13, 2025. This resolution authorizes ESRB to oversee compliance with the operation and maintenance standards set forth in General Order (GO) 167-C for ESSs operating in California.

The Data Requests encompass a broad range of topics related to summer reliability, including operation and maintenance practices, staffing levels, fuel and water supply issues, environmental constraints, procurement of parts, and technical services. ESRB's Generation team reviews the previous year's DR responses and conducts analysis to revise and update the current year's DRs, ensuring it reflects current concerns and conditions.

To incorporate a wide range of regulatory perspectives, ESRB coordinates with other divisions, such as the Energy Division, and external agencies including the California Energy Commission (CEC) to solicit input on the content of ESRB's data requests. GAOs and ESSOs are required to respond to all questions in the Summer Reliability DRs within 30 days.

Once responses are submitted, ESRB Generation Section staff review and analyze them to assess overall summer preparedness, identify operational challenges and limitations, and observe emerging trends across the field. These efforts provide ESRB with a comprehensive view of the readiness of all energy generation resources and energy storage systems under the jurisdiction of the CPUC. The insights gained also inform audit planning, investigations, and other enforcement-related activities conducted by the Generation Section.

2. Summer Outage Monitoring

From June 1st to October 31st, the ESRB Generation team conducts daily monitoring of power plant outages. The purpose of this monitoring is twofold: to enable ESRB to track significant outages that may impact system reliability, and to ensure compliance with the operation and maintenance standards established in General Order (GO) 167-C.

Since 2017, all jurisdictional GAOs have been required to report both planned and forced outages to the Safety and Enforcement Division (SED) on a daily basis through the Power Plant Outage Reporting system (PPOR). These reporting requirements apply to all jurisdictional fossil fuel and renewable generating assets.

In 2025, the monitoring scope was expanded to include energy storage systems (ESSs). With the implementation of GO 167-C, all ESSs with a capacity greater than 50 MW now fall under the jurisdiction of the CPUC and are subject to the same PPOR reporting criteria as traditional generating assets. As a result, the 2025 Summer Reliability monitoring activities differ in both scope and nature from those of previous years. This change reflects the technological distinctiveness and unique operational characteristics of ESSs within power grid operations.

To properly monitor and analyze this broader array of power supply assets, ESRB requires differentiated strategies and methodologies that reflect the specific operational behaviors of both conventional generation and energy storage, particularly during the summer season.

Outage data for GAOs and ESSs is primarily collected from the PPOR. ESRB staff also supplement this information using data from the California Independent System Operator (CAISO) Outage Management System (OMS) and related CAISO web resources. During the summer period, GAOs

and ESSOs are required to report forced outages of 50 MW or greater that last two hours or longer, as well as planned outages of 50 MW or greater that are expected to last 24 hours or more.

Two ESRB staff members monitor and analyze these outages daily, focusing on implications for safety and reliability. When necessary, staff follow up with individual facilities to collect additional outage details. Each week, ESRB compiles a report summarizing all significant outage events, which it distributes to CPUC management and relevant regulatory agencies.

In the event of an extreme heatwave, the ESRB Supervisor may deploy the assigned engineer to be on-call for rapid response audits. These audits may be triggered by factors such as forced outages, outages exceeding 50 MW, durations longer than 24 hours, media coverage, outages in isolated areas, or disruptions within load pockets during extreme conditions.

ESRB's summer reliability initiatives, comprising both the data request process and daily outage monitoring, are essential to fulfilling ESRB's core mission: protecting public health and safety, ensuring the effective maintenance and operation of electric generating facilities, and maintaining the reliability and adequacy of the electric power supply for California residents and businesses.

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 2025 activities for WSEB:

- Currently investigating 18 utility-related wildfires
- Monitored two PSPS events in October 2025

PSPS Activities in October 2025

PSPS Activities	PG&E	SCE	SDG&E	Bear Valley Electric	PacifiCorp	Liberty Utilities
Total PSPS Activations	0	2	0	0	0	0
Total PSPS w/De-energizations	0	2	0	0	0	0
Total PSPS Post Event Reports Reviewed	0	0	0	0	0	0

WSEB Wildfire and PSPS Enforcement Actions to Date

On June 3, 2025, SED issued a proposed Administrative Enforcement Order (AEO), CPUC-21-AEO, regarding PacifiCorp's 2020 Wildfire Mitigation Plan (WMP) with a penalty of \$27,284,000. On July 3, 2025, PacifiCorp filed a Request for Hearing on the proposed AEO, H.25-07-005. H.25-07-005 has been assigned to ALJ Gerald Kelly.

On July 24, 2025, the Commission approved the Administrative Enforcement Orders (AEO) issued by SED as Resolution M-4876 (SCE) and Resolution M-4877 (PG&E). These two Resolutions resolve all issues involving SED's investigation into SCE and PG&E's noncompliance with Resolution ESRB-8, and Decisions 19-05-042, 20-05-051, 21-06-014 and 21-06-034, arising from SCE and PGE's PSPS Events in 2022 and 2023.

On October 20, 2025, PG&E paid an SED Staff Citation penalty of \$928,600 for six violations relating to non-compliance with Resolution ESRB-8 and Decision 19-05-042, arising from PG&E's PSPS during a wind event on October 28-29, 2023.

WSEB Wildfire/PSPS Enforcement	Enforcement Action	Citation/ Resolution Number	Utility	Penalty Amount	Date Approved/ Paid
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
SCE 2021 PSPS Events	Administrative Consent Order	Resolution SED-11	SCE	\$2,339,690	11/07/2024
PG&E 2021 PSPS Events	Administrative Consent Order	Resolution SED-12	PG&E	\$1,753,100	11/07/2024

WSEB Wildfire/PSPS Enforcement	Enforcement Action	Citation/ Resolution Number	Utility	Penalty Amount	Date Approved/ Paid
Fairview Fire	Staff Citation	D.16-09-055 W.25-03-001	SCE	\$2,200,000	3/21/2025
Edgewood Fire	Staff Citation	D.16-09-055 W.25-04-001	PG&E	\$7,149,000	6/16/25
SCE 2022/2023 PSPS Events	Administrative Enforcement Order	Resolution M-4876	SCE	\$826,260	07/24/2025
PG&E 2022/2023 PSPS Events	Administrative Enforcement Order	Resolution M-4877	PG&E	\$57,220	07/24/2025
SDG&E 2023 PSPS Event	Staff Citation	WSEB-1 W.25-06-001	SDG&E	\$11,090	07/24/2025
PG&E October 2023 PSPS Event	Staff Citation	WSEB-2 W.25.09-001	PG&E	\$928,600	10/20/2025

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 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.

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, the CPUC's Public Advocates Office (PAO) filed comments in support of the Motion. On September 3, 2024, CforAT filed reply comments to SCE's response.

On October 31, 2024, the Assigned Commissioner's Office issued a Proposed Decision closing the PSPS Rulemaking R.18-12-005. On November 20, 2024, the Joint Local Governments, Rural County Representatives of California (RCRC), CforAT, and Small Business Utility Advocates (SBUA) filed comments. On November 25, 2024, reply comments were filed by SDG&E, CTIA, PG&E, SCE, and PAO.

On December 9, 2024, the Commission issued Decision 24-12-005 which closed PSPS Rulemaking 18-12-005.

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 2025, 48 whistleblower submissions and 3 safety hotline inquiries were sent online to the Safety and Enforcement Division.