

# Safety and Enforcement Division



## Monthly Performance Report

March 2020

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## Disclaimer

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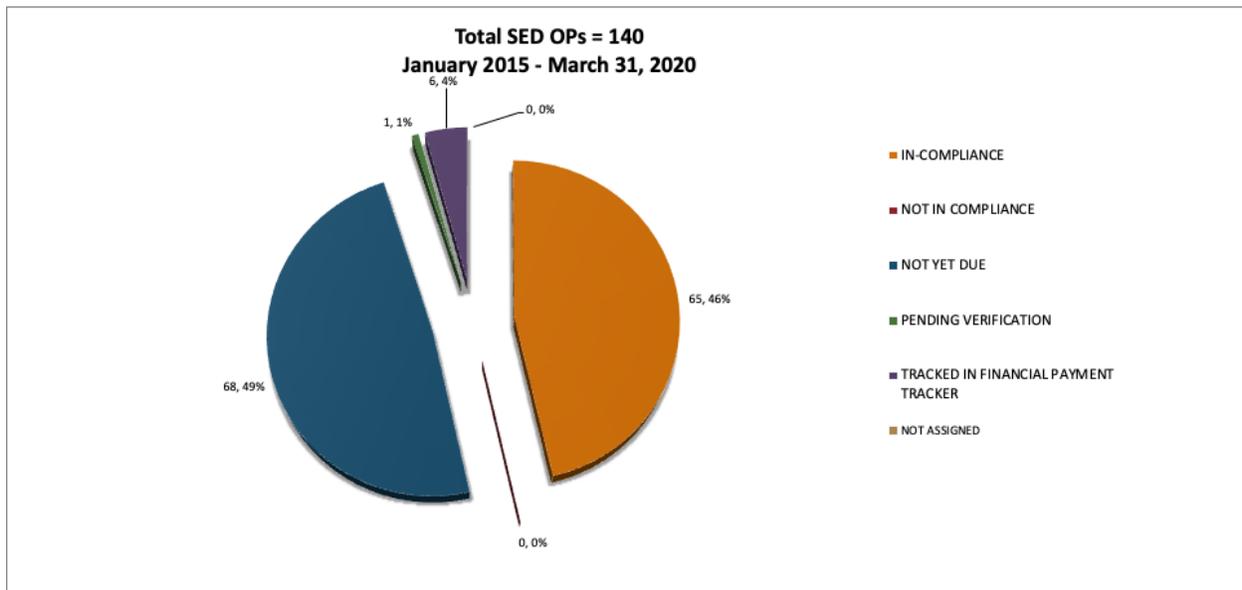
This Report has not been approved or disapproved by the CPUC.

## COMPLIANCE WITH ORDERING PARAGRAPHS (COPS)

Through March 31, 2020, SED shows 140 total entries in the COPS system: with 65 reaching compliance (46%), 68 (49%) not yet due for compliance, and 0 (0%) out of compliance. 140 (100%) of all Ordering Paragraphs are assigned to members of staff.

During March 2020, there were 0 new OP's recorded to the COPS database for the Safety & Enforcement Division.

Note the category of "tracked in financial payment tracker" (FPT) has been verified and has been deemed "in compliance" but is listed separately in the COPS tracker.



## NATURAL GAS SAFETY PROGRAM

### STAFF CITATION PROGRAM

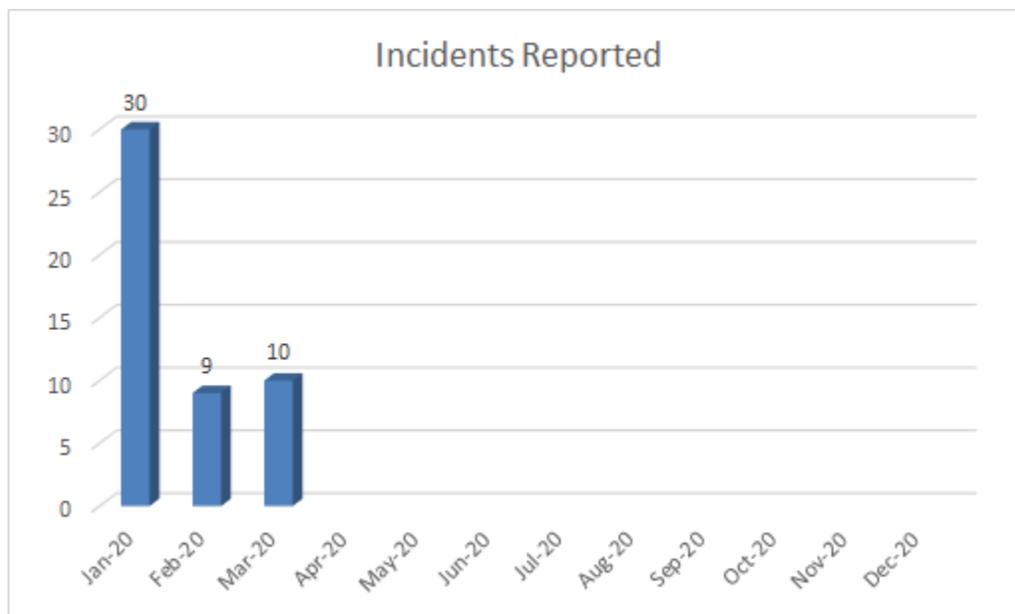
Citation Number	Utility	Amount	Violations	Date Cited	Appealed	Status
D.16-09-055 G.19-02-001	SoCalGas	\$ 3,300,000	192.13 (c), PU Code 451 & 702	2/1/2019		Active
<b>Total Cited 2019</b>		<b>\$ 3,300,000</b>				

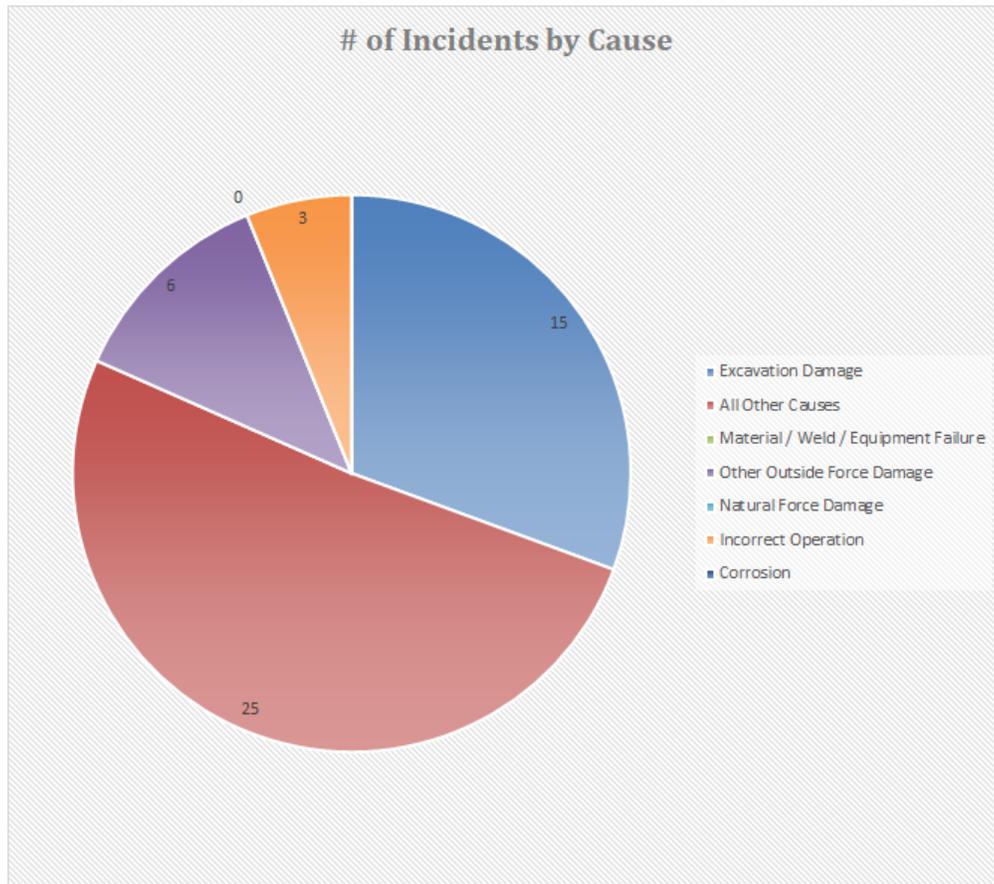
### INSPECTIONS

	2020
Conducted	8
Final Report Completed	5

### INCIDENT INVESTIGATIONS

As of March 31, 2020, GSRB Staff received 49 incidents year to date.





The CY 2020 incidents<sup>1</sup> are categorized as follows:

	Level 1	Level 2	Level 3	Level 4	TOTAL
<b>Open</b>	29	12	1	1	45
<b>Closed</b>	0	6	0	0	6
<b>TOTAL</b>	29	18	1	1	49

<sup>1</sup> Level 1: The incident did not result in injury, fatality, fire or explosion. Level 2: The incident did not result in injury, fatality, fire or explosion. The incident may have been reported due to Operator judgment. Level 3: The incident resulted in a release of gas, but the incident did not result in injury, fatality, fire or explosion. Level 4: The incident resulted in injury, fatality, fire or explosion caused by release of natural gas from the Operator's facilities.

## UTILITY SELF-IDENTIFIED VIOLATION (SIV) INVESTIGATIONS

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There were no self-identified violations reported in January. SED has reviewed the Self-Identified Violations reported in calendar year 2019 and have not observed any significant trends. Of the seven self-identified violations, five are scheduled to be addressed during the annual reviews and the remaining two from PG&E are currently being investigated by SED.

## NATURAL GAS RELATED PROCEEDINGS

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- **Gas Safety OIR (R.11-02-019) (Commissioner Guzman Aceves/ALJ Kersten) (Advisory):** The proceeding amended General Order GO 112-F, made fully effective no later than January 1, 2017. R.11-02-019 was closed in June 2015, however, it was re-opened after various applications for rehearing were filed by intervenors including the Utility Workers Union of America, the Office of ratepayer Advocates and the City of San Carlos. In February 2017, D. 17-02-015 disposed of a joint rehearing request from the San Carlos and ORA. In addition, Pacific Gas and Electric Company filed a petition to modify Decision 15-06-044 on January 31, 2017, on issues related to cost recovery. On August 11, 2017, SED filed a subsequent petition to modify D. 15-06-44, seeking to conform GO 112F to more stringent federal regulations. On November 14, 2017, PG&E filed a motion to withdraw its petition. On October 5, 2018, the Commission issued an Order denying rehearing of Decision (D).15-06-044. This proceeding is closed.
- **Mobile Home Parks Pilot Program (Implementing D.14-03-021) (ALJ Semcer/Commissioner Rechtschaffen):** This decision established a three-year pilot program authorizing each California investor-owned utility to convert 10 percent of master-metered gas and/or electric Mobile Home Park spaces within its operating territory to direct utility service. San Diego Gas & Electric Company (U902M) filed A.17-05-008/ A.17-05-007 for Approval to Extend the Mobile Home Park Utility Upgrade Program. The Commission on September 29, 2017, extended the program through the end of 2019 via Resolution E-4878. Rulemaking 18-04-018 (ALJ Kersten / Commissioner Rechtschaffen) was filed on April 26, 2018, Order Instituting Rulemaking to Evaluate the Mobilehome Park Pilot Program and to Adopt Programmatic Modifications. The Commission has determined that there is a need

to extend the MHP Pilot Program to December 31, 2021 while the working group collects and refines MHP cost forecasts and actual costs and safety data necessary in order to fully evaluate the MHP Pilot Program and consider a more permanent program. The Commission on March 14, 2019, again extended the program through the end of 2021 via Resolution E-4958. PHC for Rulemaking 18-04-018 occurred on July 30, 2018. Scoping memo issued on 8/31/2018. SED/ED convene utility technical working group to refine annual report template and data gathering 30 days from Scoping Memo. Workshop #1 was held on 10/17/2018. A ruling on 2/15/2019, is seeking comments by March 1, 2019, and reply comments by March 8, 2019, regarding Annual Report template and 2019 Utility Annual Reports by March 1, 2019. Workshop #2 was held on March 20-21, 2019. Decision 19-10-023 extends the statutory deadline in this proceeding to April 26, 2020.

- **PG&E Locate and Mark Practices OII (I.18-12-007) (Commissioner Rechtschaffen/ALJ Allen) (SED Advocacy):** The Order Instituting Investigation and Order to Show Cause on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company with Respect to Locate and Mark Practices and Related Matters was issued on December 13, 2018. CPUC institutes this formal investigation to determine whether PG&E has violated legal requirements for the utility to timely locate and mark natural gas pipelines to ensure that third party construction excavation does not damage pipes and other components and thus diminish safety. This OII also directs PG&E to show cause as to why the Commission should not find violations in this matter, and why the Commission should not impose penalties, and/or any other forms of relief, if any violations are found. PG&E is directed in this order to provide a report on these matters, provide answers to certain questions, and to provide other specified information to the Commission. In September 2019, in responding to the Commission directions and in coordination with other proceedings, SED, PG&E, and Coalition of California Utility Employees (CUE) reached a settlement agreement and filed the settlement agreement with the Commission for approval. On October 21, 2019, The ALJ held a hearing for the Settlement Agreement that was jointly filed by SED, PG&E, and CUE. At the hearing, the ALJ admitted exhibits submitted by different parties, crossed examined witnesses from SED and PG&E on the Settlement

Agreement. On October 21, 2019, The ALJ held a hearing for the Settlement Agreement that was jointly filed by SED, PG&E, and CUE. On January 17, 2020, the ALJ issued Presiding Officer's Decision (POD) adopting the proposed settlement agreement with modifications. The Settling Parties have 20 days from the service of the Presiding Officer's Decision to file and serve a motion accepting the modifications to the proposed settlement or requesting other relief. In response to the POD, the Settling Parties timely filed a Joint Motion accepting the POD's modifications to the proposed settlement and requesting other relief (in the form of amendments to the POD). On February 14, 2020, the ALJ ruled that the Joint Motion's acceptance of the POD's modifications to the proposed settlement is granted but the Joint Motion's request to amend the POD is denied. On February 20, 2020, the Commission confirmed that the Presiding Officer's Decision on January 17, 2020 became the decision of the Commission. Closed.

- **Aliso Canyon OII (I.19-06-016) (Commissioner Rechtschaffen /ALJ Kenney / ALJ Poirier) (SED Advocacy):** The Order Instituting Investigation on the Commission's Own Motion into the Operations and Practices of Southern California Gas Company with Respect to the Aliso Canyon storage facility and the release of natural gas, and Order to Show Cause Why Southern California Gas Company Should Not Be Sanctioned for Allowing the Uncontrolled Release of Natural Gas from its Aliso Canyon Storage Facility. SED filed Opening Testimony on November 22, 2020 identifying:
  1. Numerous Section 451 safety violations related to the uncontrolled release of natural gas or methane for 111 days
  2. Violations related to instances in which SoCalGas did not cooperate with SED; and
  3. Violations of Section 451 due to SoCalGas's recordkeeping issues related the Aliso Canyon Facility and the well (SS-25) incident.

SED's Reply Testimony is due on March 20, 2020.

## ELECTRIC SAFETY AND RELIABILITY PROGRAMS

In March 2020, Electric Safety and Reliability Branch:

- Received nine electric facilities incident reports, one power plant incident report, and closed 14 previously reported electric facilities incident investigations.
- Investigated 28 customer safety and reliability complaints.
- Issued five Notice of Violation letters.
- Issued one electric distribution audit report and one transmission audit report.
- Performed two Communication Infrastructure Provider audits.
- Monitored 15 planned outages and five forced outages reported by natural gas and renewable energy power plants.

### Electric Facilities and Generation Incident Investigations as of March 31, 2020

ESRB		Level 1	Level 2	Level 3	Level 4	Total <sup>2</sup>
<b>Total open incidents</b>	Electric Facilities	12	18	66	62	158
	Generation	0	0	4	1	5
<b>Total incidents reported in 2020</b>	Electric Facilities	2	2	12	7	23
	Generation	0	0	3	0	3
<b>Total incidents closed in 2020</b>	Electric Facilities	2	5	12	7	26
	Generation	0	0	0	0	0
<b>Total open 2020 incidents</b>	Electric Facilities	2	2	12	7	23
	Generation	0	0	3	0	3
<b>Incidents reported in March 2020</b>	Electric Facilities	1	0	4	4	9
	Generation	0	0	1	0	1
<b>Incidents closed in March 2020</b>	Electric Facilities	2	5	4	3	14
	Generation	0	0	0	0	0

<sup>2</sup> Level 1: A safety incident that doesn't 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).

**ELECTRIC AND COMMUNICATIONS FACILITY SAFETY: PROCEEDINGS**

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- **Rulemaking to Implement Electric Utility Wildfire Mitigation Plans pursuant to Senate Bill 901 (2018) (R.18-10-007) (Commissioner Picker/ALJ Allen/ALJ Thomas) (Advisory):** This rulemaking was opened to implement the provisions of Senate Bill 901 related to electric utility wildfire mitigation plans (WMPs) and will provide a venue for review of the initial plans, and will develop the process for review and implementation of wildfire mitigation plans to be filed in future years. Phase 1 of the proceeding concluded with the Commission's issuance of six (6) decisions that collectively approved the IOUs and ITOs WMPs and gave guidance on the legal meaning of SB 901. The Phase 2 Ruling intends to develop: (1) metrics to evaluate the WMPs, (2) templates for consistent data reporting, and (3) a process for next year's WMP reviews that provides more time for intervenors and the Commission to review. On February 5th, the assigned ALJ issued a proposed decision (PD) on Community Awareness and Public Outreach Before, During and After Wildfire, and Explaining Next Steps for Other Phase 2 Issues. On February 7th, the IOUs filed their 2020 Wildfire Mitigation Plans (WMPs) pursuant to the schedule outlined in Resolution WSD-001. On February 20th, WSD issued a notice that IOUs were permitted until February 28th to submit non-substantive revisions to February 7th, 2020 WMP submissions for consideration during WSD evaluation. In March 2020, parties filed reply comments on the community awareness and public outreach proposed decision issued in February 2020. On March 18, 2020, the Commission issued Decision (D.)20-03-004 adopting the community awareness and public outreach proposed decision, with some minor modifications. SED staff continue to assist WSD in review and assessment of utility WMPs. Pending.
- **Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions (R.18-12-005) (Commissioner Picker/ALJ Poirier) (Advisory):** On December 13, 2018, the Commission opened an Order Instituting Rulemaking (R.)18-12-005 to examine its rules allowing electric utilities under the Commission's jurisdiction to deenergize power lines in case of dangerous conditions that threaten life or property in California. Among other things, this proceeding will focus on developing best practices and evaluation criteria,

ensuring coordination with first responders, mitigating impact on vulnerable populations, ensuring consistency in noticing and reporting of events, and examining ways to reduce the need for de-energization. On June 4, 2019, the Commission issued D.19-05-042 adopting de-energization (Public Safety Power Shut-Off, or PSPS) communication and notification guidelines (phase 1 guidelines) IOUs along with updates to the requirements established in Resolution ESRB-8. On August 14, 2019, the assigned Commissioner issues a scoping memo and ruling setting the issues to be addressed and preliminary schedule for Phase 2 of this rulemaking. The purpose of Phase 2 is twofold; (1) the Commission will examine issues that were outside the scope of Phase 1; and (2) the Commission will revisit some of the issues in Phase 1 that require additional examination and development. SPD, ED, SED and CD staff provided additional high-level review to flag any significant and outstanding issues raised by parties in comments regarding amended or new PSPS guidelines. The assigned ALJ solicited comments and edits to these comments. President Batjer's is currently assembling them and will incorporate selected ones into a second draft that will be reviewed again by the PSPS working group consisting of staff and management from the aforementioned divisions. Pending.

- **Rulemaking to Evaluate the Mobilehome Park Pilot Program and to Adopt Programmatic Modifications (R.18-04-018) (Commissioner Rechtschaffen /ALJ Semcer) (Advisory):**

D.14-03-021 established a three-year pilot program authorizing each California investor-owned utility (IOU) to convert 10 percent of master-metered gas and/or electric Mobile Home Park (MHP) spaces within its operating territory to direct utility service. On February 1, 2019, the utilities filed Annual Report Response. Parties have been invited to file comments on those responses and on the annual reporting process. In April 2019, the ALJ issued ruling entering workshop presentations into the record. Parties were invited to provide comment on Scoping Memo questions and next steps. Commissioner Rechtschaffen visited two MHPs. Parties to the proceeding were invited to attend as an all-party meeting. Next step is a Proposed Decision (PD). In February 2020, the Commission issued Proposed Decision (PD) to establish a 10-year program. The PD finds that it is premature to direct an MHP electrification pilot. SED, ED, and HCD will convene workshops within six months from

the final decision ratification to discuss mobile home electrification topics. The Proceeding will be left open to consider standardizing MHP 200 ampere electric service system upgrades “to the meter” and possibly “beyond the meter”. 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) (Advocacy):** On January 22 and 23, 2018, industry group of pole-owners and pole-tenants hosted an informal workshop to discuss a phased approach and path forward regarding access to pole data, attachment data, and conduit data, ESRB attended and participated in the workshop. The industry group issued a workshop report on February 28, 2019. On May 10, 2019, ALJ Mason issued a ruling requesting parties to file comments by June 24, 2019 on Right of Way Rules. On June 4, 2019, ALJ Mason issued a ruling approving parties’ recommendation to create working groups to develop requirements for Tracks 1, 2, and 3. Parties have considered/offered off-site locations for hosting Track 2 workshops, most likely in mid-April. The Track 2 workshops will provide a venue to discuss what elements should be included in the IOU pole and attachment databases. Communications Division (CD) currently has no further information that can be shared regarding the Track 2 Workshop other than a potential location being offered. Pending.
- **PSPS Order Instituting Investigation (I.19-11-013) (Commissioner Batjer/ALJ DeAngelis) (Advisory).** This OII was initiated by the Commission on November 13, 2019 to determine whether California’s investor-owned electric utilities prioritized safety and complied with the Commission’s regulations and requirements with respect to their Public Safety Power Shutoff (PSPS) events in late 2019. This OII is a companion to R.18-12-005, the Commission’s rulemaking to examine the practice of utility de-energization of powerlines during dangerous conditions. The investigation will serve as a forum for taking evidence to evaluate both the effectiveness and impacts of all phases of the late 2019 PSPS events. In the current phase of the OII, SED is serving in an advisory capacity. SED continues to investigate the late 2019 PSPS events in accordance with the preliminary scoping memo issues. Pending.
- **Proceeding to Consider Amendments to GO 95 (R.17-10-010) (Commissioner Batjer /ALJ Mason/ALJ Goldberg) (Advocacy):** As directed in D.16-01-046, SED filed P.17-03-004 to adopt, amend, or repeal rules in GO 95. In response to SED’s petition, the Commission

opened R.17-10-010 in October 2017, to consider the amendments discussed in SED's petition. On July 31, 2018, the ALJ issued a scoping memo and ruling setting the schedule for this proceeding and directing SED to convene a workshop to discuss the scoped issues. SED and parties held three workshops in August 2018 and September 2018 and addressed amendments to GO 95 rules regarding climbing space, fall protection, pole strength, and pole steps. Parties reached consensus on all the rule change proposals and on October 31, 2018, SED filed a Joint Parties' Workshop Report to the Commission. On January 16, 2020, the Commission issued Decision 20-01-010 which adopted Joint Parties' eighteen proposed rules as presented in their Workshop Report to amend General Order 95. The proposed rules adopted will go into effect no later than 180 days from the issuance date of the decision. The Commission ordered SED to revise GO 95 to incorporate the new and amended rules and publish the revised GO 95 on the Commission's website no later than 180 days from the effective date of this Decision. SED is currently incorporating the adopted rules into GO 95. Pending.

- **Physical Security of the Electric System and Disaster and Emergency Preparedness (R.15-06-009) (Commissioner Rechtschaffen/ALJ Kelly) (Advocacy):** Phase I addressed physical security for electric supply systems and was resolved by D.19-01-018. Phase II addresses disaster and emergency preparedness plans for electrical corporations and regulated water companies. On April 3, 2019, ALJ Kelly issued a ruling requesting parties respond to two questions related to changes in GO 166 and standardization of emergency preparedness plans. On November 14, 2019, the Commission issued Decision 19-11-021 extending the statutory deadline for Phase II of this proceeding to May 29, 2020. On January 10, 2020; SCE, PG&E, and SDGE submitted a Petition for Modification (PFM) to D.19-01-018. The IOUs request that routine compliance Security Plan documents ("Category 1" information), that D.19-01-018 directed the IOUs to submit to the Commission, be accessed via a "Reading Room" proposal instead. On February 14, 2020 the ALJ issued a ruling allowing comments and reply comments on the Staff Proposal regarding Proposed Changes to GO 166 and GO 103A. SED submitted comments on 3/6/20 and reply comments on 3/13/20. The ALJ granted SED leave to respond to SCE's reply comments on 3/23/20 to clarify the difference between

SED-ESRB's role and SED Advisory within the proceeding and instructed SED and SCE to meet and confer. SED has conducted a meet and confer with SCE via phone and is preparing a response to SCE's reply comments. Pending.

- **PG&E's 2017 Wildfires OII (I.19-06-015) (Commissioner Rechtschaffen/ALJ Houck)**  
**(Advocacy):** On June 27, 2019, the Commission issued an Order Instituting Investigation (OII) on the Commission's own motion into the maintenance, operations and practices of Pacific Gas and Electric Company (PG&E) with respect to its electric facilities; and Order to Show Cause (OSC) why the Commission should not impose penalties and/or other remedies for the role PG&E's electric facilities had in igniting fires in its service territory in 2017. SED began settlement discussions with PG&E on August 7 and have continued meeting at least once a week in multilateral discussions. On December 17, 2019, SED, OSA, PG&E and CUE filed a joint motion for approval of a settlement agreement. On February 27, 2020, the assigned ALJ issued a Presiding Officer's Decision approving the Proposed Settlement Agreement with modifications. On March 18, 2020, SED filed a motion supporting the settlement agreement without modifications while also not opposing the POD and its revisions. On March 27, 2020, Commissioner Rechtschaffen filed a request for review with proposed modifications to the POD for Commission consideration. On March 30, 2020, the ALJ issued a ruling requiring any response to an appeal or request for review to be filed by April 9, 2020. Pending.
- **Distributed Energy Resources (R.14-08-013) (President Batjer /ALJ Mason/ALJ Allen)**  
**(Advisory):** On September 28, 2017, the Commission adopted a Decision that addressed Track 1 Demonstration Projects A (Integration Capacity Analysis) and B (Locational Net Benefits Analysis). On November 20, 2019, the Commission held a Prehearing Conference (PHC). The scope of the PHC was: 1) Responsiveness of Communications Providers during PSPS; 2) D.1908025 Compliance, 3) Timeliness of Response to CalOES and CalFire. The Commissioner asked the parties regarding: 1) sharing of Communications outage data publicly and 2) whether Communications providers were present at CalOES during PSPS. This proceeding was reassigned to President Marybel Batjer. ESRB will continue to review the issues and provide advisory support when needed.

- **SCE Appeal of Twentynine Palms Citation (K.18-03-008) (ALJ Kim) (Advocacy):** ESRB investigated an incident that occurred on August 1, 2015 in Twentynine Palms, involving the failure of a crossarm and a resulting overhead conductor clearance problem that caused injury to 3 individuals. 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 that was issued to SCE on February 12, 2018. The amended citation was the result of new violations of GO 95 that SED had discovered. A hearing was held in December 2018, in February 2019, and March 2019. Briefs and reply briefs were filed in April 2019. Pending.

### OTHER ACTIVITIES

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- **2019 Wildfires:** In October 2019, California has experienced devastating wildfires. In Northern California, the Kincade Fire has burned more than 76,800 acres. The fire has destroyed and damaged about 260 structures and caused injuries to two firefighters. In Southern California, the Saddle Ridge Fire, the Easy Fire, and the Maria Fire, have burned more than 17,000 acres. The fires have destroyed and damaged many structures and caused one fatality and 8 injuries to firefighters. SED is currently working closely with CAL FIRE and other agencies to investigate PG&E, SCE, and communications companies' compliance with the Commission's safety rules.
- **Compliance with D.17-09-024 regarding Long Beach Incident:** D.17-09-024 adopted a Settlement Agreement between Southern California Edison and SED. Under the settlement, 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 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 quarterly meetings.

- **SB 100 - California Renewables Portfolio Standard Program: emissions of greenhouse gases:** SB 100 requires a 100% renewable and zero-carbon energy supply in California by year 2045. This will require a massive buildout of new energy supply resources and infrastructure. ESRB is coordinating with the Safety Policy Division and Energy Division on drafting a whitepaper outline for safely implementing the SB 100 through possible pathways.

## MONITORING THE WHISTLEBLOWER WEBSITE

The Risk Section has been overseeing intake for complaints that arrive via a “whistleblower” application on the Commission’s web site. Whistleblower protections are afforded to utility employees and contractors who report potentially unsafe or illegal practices.

STATISTICS - 1/01/20 – 3/31/2020

Note: This is for complaints filed using the on-line Whistleblower Application ONLY.

