

Safety and Enforcement Division



Monthly Performance Report

November 2019

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Disclaimer

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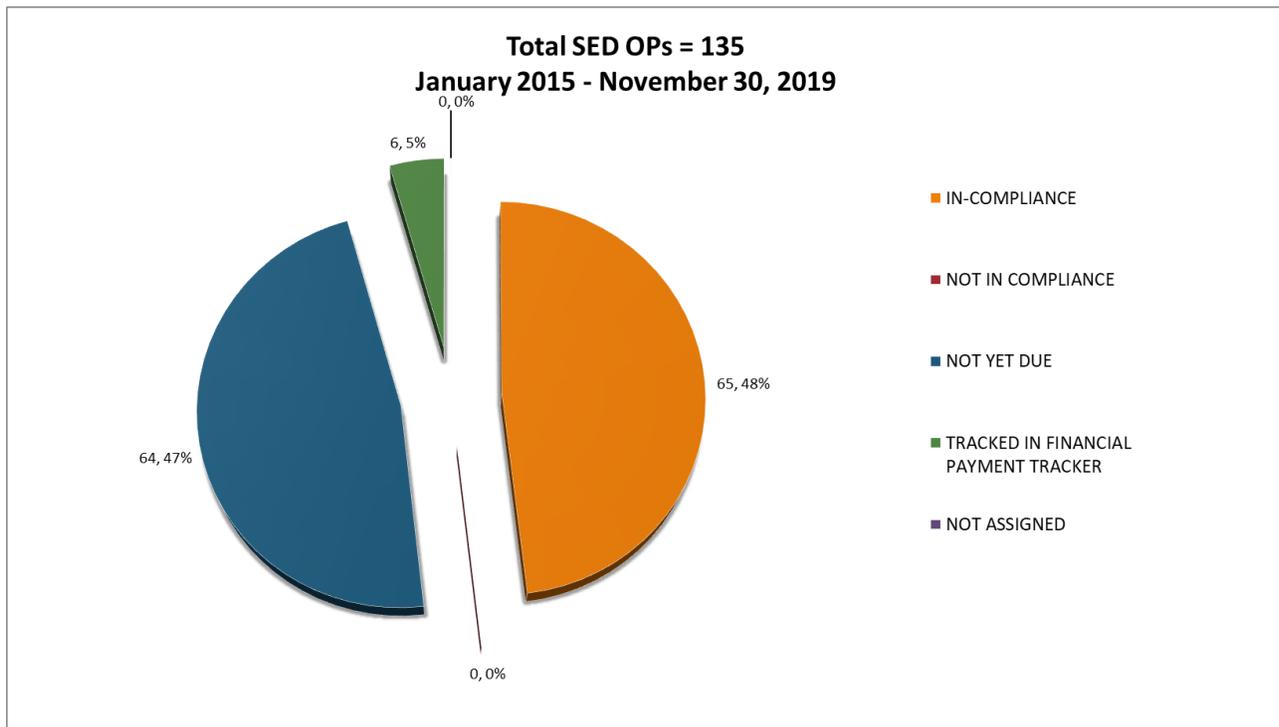
This Report has not been approved or disapproved by the CPUC.

COMPLIANCE WITH ORDERING PARAGRAPHS (COPS)

Through November 30, 2019, SED shows 135 total entries in the COPS system; with 65 reaching compliance (48%), 64 (47%) not yet due for compliance, and 0 (0%) out of compliance. 135 (100%) of all Ordering Paragraphs are assigned to members of staff.

During November 2019, there were 0 new OPs 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

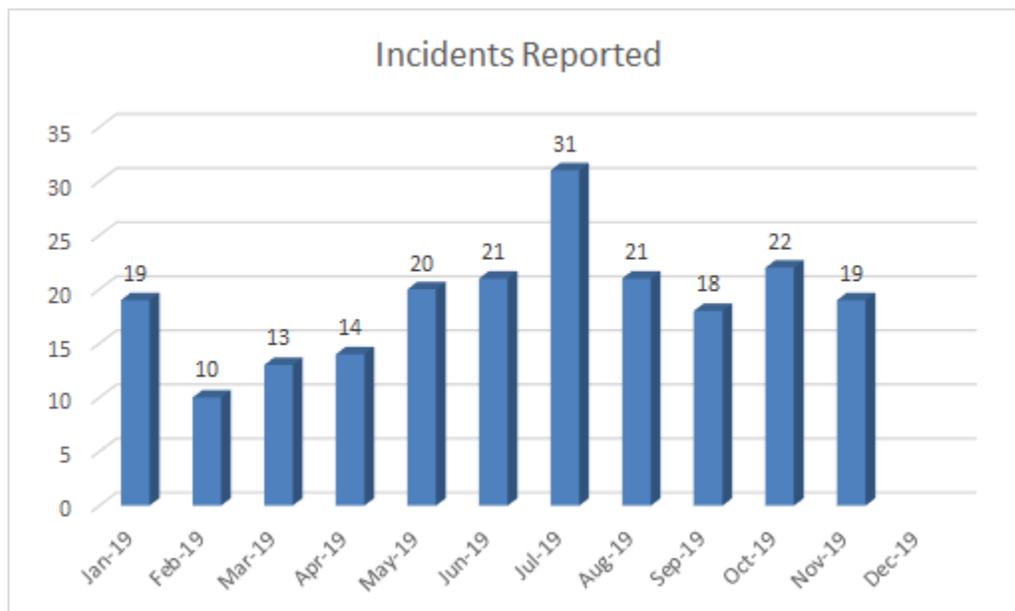
Citation Number	Utility	Amount	Violations	Date Cited	Appealed	Status
D.16-09-055 G.19-02-001	SoCalGas	\$ 3,300,000	192.13 (c), PU Code 451 & 702	2/1/2019		Active
Total Cited 2019		\$ 3,300,000				

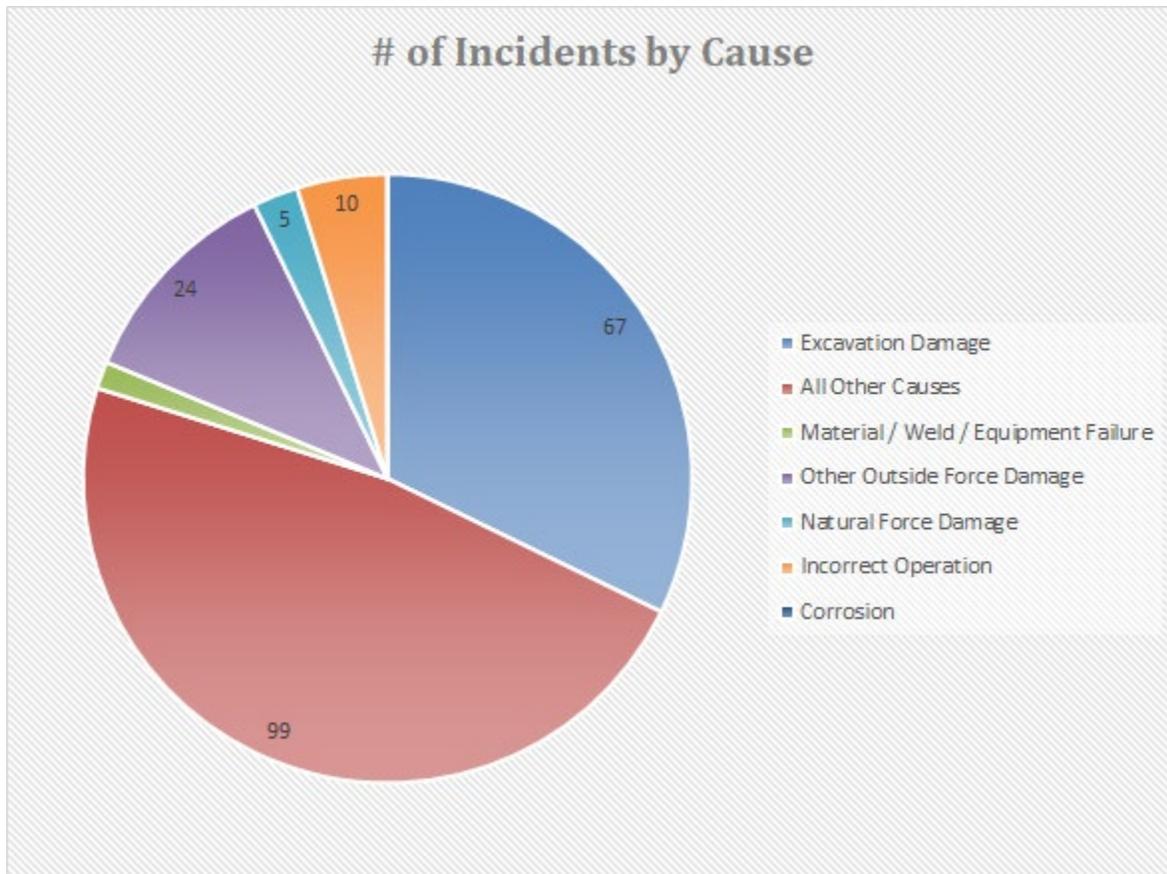
INSPECTIONS

	2019
Conducted	44
Final Report Completed	40

INCIDENT INVESTIGATIONS

As of November 30, 2019, GSRB Staff received 208 incidents year to date.





The CY 2019 incidents¹ are categorized as follows:

	Level 1	Level 2	Level 3	Level 4	TOTAL
Open	76	40	4	6	126
Closed	36	33	2	0	71
TOTAL	112	73	6	6	197

¹ 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

At the end of each year, the SIV process owner will conduct an annual review, which includes a trend analysis of systemic issues, determination of investigation effectiveness, and possible revision of investigation criteria. There were no self-identified violations reported in November.

NATURAL GAS RELATED PROCEEDINGS

- **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. Disposition of PG&E's petition and UWUA's application is pending. 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. The matter is pending.
- **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. 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.

- **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. On 2/5/2019, a Law and Motion Hearing was held. A Prehearing Conference was scheduled for 4/4/2019. Scoping memo was issued on 5/7/19 and a second PHC was held on 5/29/19.
- **Citation Program OIR (R.14-05-013) (President Picker/ALJ Burcham) (Advisory):** Decision 16-09-055 was issued on September 29, 2016. Some key points are listed below:
 - An administrative limit of no more than \$8 million for each citation.
 - Utility reporting of self-identified potential violations is voluntary.
 - Utilities need not notify city and county officials of a self-identified potential violation unless staff requires it.
 - This proceeding was reopened on February 21, 2017, as Senator Jerry Hill issued a petition for modification requesting the Commission to modify the decision to keep in place, rather than weaken, the mandatory reporting requirements that were imposed under ALJ-274. In March, several parties filed comments to Senator Hill's request, and Hill filed reply comments in early April. The matter is pending.

ELECTRIC SAFETY AND RELIABILITY PROGRAMS

In November 2019, Electric Safety and Reliability Branch:

- Received seven electric facilities incident reports, one power plant incident report, and closed eight previously reported electric facilities incident investigations;
- Investigated 29 customer safety and reliability complaints;
- Issued two Notice of Violation letters/audit reports;
- Performed two Electric Distribution audits;
- Performed one Communication Infrastructure Provider (CIP) audit;
- Monitored eight forced outages and 16 planned outages reported by natural gas and renewable energy power plants.

Electric Facilities and Generation Incident Investigations as of November 30, 2019

ESRB		Level 1	Level 2	Level 3	Level 4	Total ²
Total open incidents	Electric Facilities	12	24	64	65	165
	Generation	0	1	1	2	4
Total incidents reported in 2019	Electric Facilities	12	26	43	36	117
	Generation	0	1	0	1	2
Total incidents closed in 2019	Electric Facilities	4	10	24	37	75
	Generation	0	0	0	1	1
Total open 2019 incidents	Electric Facilities	9	23	37	27	96
	Generation	0	1	0	1	2
Incidents reported November 2019	Electric Facilities	1	1	3	2	7
	Generation	0	0	0	1	1
Incidents closed in November 2019	Electric Facilities	2	0	1	5	8
	Generation	0	0	0	1	1

² 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

- **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. In November 2019, parties to R.18-10-007 filed comments on Phase 2 matters, in accordance with a previously issued ALJ ruling requesting comments. 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 de-energize 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: first, the Commission will examine issues that were outside the scope of Phase 1, and second, the Commission will revisit some of the

issues in Phase 1 that require additional examination and development. The de-energization OIR working group participated on a 11/27 conference call to discuss next steps. A Staff Proposal, involving the collaboration of SED, ED, and Communications Division will be drafted in December and will be mailed by mid-January. The staff proposal will tentatively address updated guidelines, website and customer service requirements, development of an advisory board, advising medical baseline customers in the near-term, customer resource center requirements, and updated guidelines (especially for communication (cell towers, etc.) and transportation networks (traffic lights, transit agencies, EVs, coordinating with Caltrans, etc.). This proceeding will be reassigned to a different Commissioner. 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 is planning to visit one or more MHP's in the bay area in December and may do so as part of an all-party meeting. Multiple parties have expressed interest in attending. Next step is a Proposed Decision (PD). 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. On August 13-14, parties attended a workshop by pole owners to discuss Track 1 Work Plans in San Diego. On October 2, 2019, parties filed the Track 1 workshop report for workshops held in August and September 2019. On October 22, 2019, parties filed comments in response to the workshop report. Due to a conflict with a prehearing conference (PHC) for R.18-03-011, the workshop previously scheduled for November 19 and 20 in I.17-06-027 was cancelled and will be rescheduled in early 2020. 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. In November 2018, Parties filed comments on the Workshop Report and in December 2018 parties filed reply comments. On September 17, 2019, the ALJ issued a Ruling inviting the parties to file and serve further comments to the Workshop Report. On September 30, 2019, SED filed and served its additional comments on the workshop report. This proceeding was reassigned to President Marybel Batjer. Pending issuance of a Proposed Decision.
- **PG&E Locate and Mark Practices OII (I.18-12-007) (Commissioner Rechtschaffen/ALJ Allen) (Advocacy):** On December 6, 2018, the Commission's SED issued an Investigative Report, which found that PG&E falsified safety records related to locating and marking its underground natural gas facilities and violated federal and state regulations. On December 13, 2018, the Commission initiated this formal proceeding to investigate PG&E's Damage Prevention and Locate and Mark programs and practices 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. 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. The 18-month deadline for this proceeding was December 1, 2019. The deadline has been extended so that the ALJ can issue a ruling to present the Staff Proposal to the parties in this proceeding. 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. On July 29, 2019, the ALJ held a status conference confirming filing deadlines prior to the Pre-hearing Conference (PHC). A PHC was held on August 13, 2019, in San Francisco to discuss the scope and schedule of the proceeding. On August 23, 2019, the assigned Commissioner issued a ruling on the scope and schedule. SED began settlement discussions with PG&E on August 7 and have continued meeting at least once a week in multilateral discussions. On November 15, 2019, SED filed its Reply to PG&E's Attachment B Report regarding potential systemic issues relating to the 2017 October Fire Siege. On November 21, 2019, SED and

PG&E filed a joint motion to extend the proceeding schedule in order to focus on a settlement agreement after reaching an agreement in principle. The ALJ granted the motion and adopted the proposed schedule on November 25, 2019. On November 26, 2019, SED filed a motion to expand the scope of the proceeding to include the 2018 Camp Fire attaching the final redacted report. SED continues to meet with PG&E and other parties for settlement discussions. 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

- **2019 Wildfires:** In October 2019, California has experienced devastating wildfires. In Northern California, the Kincade Fire has burned more than 76,800 acres and still burning. The fire has destroyed and damaged about 260 structures and caused injuries to two firefighters. In Southern California, the Saddleridge Fire, the Easy Fire, and the Maria Fire, have burned more than 17,000 acres and still not fully contained. 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.
- **Ignacio-Alto-Sausalito 60 kV Transmission Emergency Project:** The Ignacio-Alto-Sausalito 60 kV double circuit transmission lines are the only transmission lines supplying power to the City of Sausalito. In May 2019, PG&E discovered that one of the transmission towers is in danger of falling. To mitigate the risks, PG&E developed an emergency plan to install a temporary shoo fly. The shoo fly consists of 32 poles and will replace ten old towers. PG&E completed the work on August 22, 2019 and began removing the old towers on August 29, 2019. As of September 9, 2019, PG&E has completed repairing and replacing the towers, interconnected the shoo fly line segment to the IAS Lines. City of Sausalito's power supply reliability had been restored to the acceptable level. As of October 28, 2019, PG&E has completed project component #1 on constructing the shoo fly to replace the 10 old towers within the GGNRA. PG&E is still working on the project component #2 for repairing and reinforcing the 12 old towers outside the GGNRA. SED is closely monitoring PG&E's work. Pending.
- **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.

UTILITY RISK ASSESSMENT BRANCH

SAFETY ADVISORY SECTION

SUMMARY OF RECENT ACTIVITIES:

- **Investigation into Safety Culture of Pacific Gas and Electric Company and PG&E Corp. (I.15-08-019) (President Batjer/ALJ Allen) (Advisory):** RASA staff are working with NorthStar to conduct work tasks and analysis for Phase 2 of the proceeding. RASA and NorthStar Staff met with SED management, Advisors, and the ALJ to discuss additional tasks to investigate Public Safety Power Shutoffs for PG&E as well as other IOU's. NorthStar has begun conducting interviews with PG&E staff and executives. A briefing for President Batjer is scheduled for December 30, 2019.
- **Gas Leak Abatement OIR (R.15-01-008) (Commissioner Rechtschaffen/ALJ Kersten) (Advisory):** RASA staff are working with California Air Resources Board staff to complete the analysis of the annual emissions report filings. A joint CPUC/ARB workshop was conducted on December 2 to solicit comments on the draft annual report which was published in November 2019. The annual workshop that identifies and then updates the annual reporting templates for potential changes to the reporting requirements takes place in January 2020. The Decision incorporating the disallowance of cost recovery for Lost and Un-Accounted For (LUAF) gas and other matters was approved by the Commission in August 2019. The Technical Working Group modified the guidelines for filing Advice Letters for funding Compliance Plan initiatives mid-GRC cycle and updating Emission Factors used for reporting emissions in the annual report filing.
- **Sempra RAMP:** The OII for the proceeding has been issued. Sempra conducted a workshop on December 16 to present their RAMP report and respond to questions regarding their analysis. Several RASA staff are conducting analyses of the Sempra RAMP report. Staff are also responding to questions from ED staff in the Gas Rates Section, who are looking for SMAP advice from RASA staff regarding a request from Sempra to have an additional attrition year in their GRC, which would affect the Sempra RAMP report review and timing.

- **Utility Poles and Conduit (I.17-06-027/R.17-06-028) (Commissioner Batjer/ALJs Mason and Kenney):** RASA staff provided Track 1 PD recommendations to the ALJ with Communications Division, Energy Division, and Legal input. SED, Energy, and Communications Division staff are participating in working group meetings with the IOU's and communication utilities to achieve the goals of OII. The Track 2 working group and steering committee, which is addressing Attachment data including for joint poles has begun and workshops which were scheduled for November 19-20 have been rescheduled to January 28-29th. RASA staff have worked with Communications Division and is bringing ESRB staff up to speed on the status of the proceeding, so they will be able to take over the lead SED role for facilitating the Track 2 working group, steering committee, and proceeding.
- **PG&E Mobile App Pilot (A.19-07-019) (Commissioner Rechtschaffen/ALJ DeAngelis)** In accord with the rulemaking's Scoping Memo, staff held a December 3 public workshop attended by staff from multiple Commission divisions and the assigned ALJ. PG&E provided first draft intentions and proposals to frame the IOU's vision for launching what is believed will be North America's first safety reporting mobile app targeting the general public. Staff probed PG&E's assumptions and questioned items that were confusing. Recommended staff revisions conveyed at the workshop included allowing the public to enlist in the pilot without the need for a direct PG&E email invitation, partnering with CPUC staff to offer a referral program for citizen complainants to enlist in the pilot, and encouraging pilot participants to enroll and complete any PG&E-required registration or training or within a limited time interval of any PG&E invitation so that enrollees will be prepared to put forth a timely report in the event they should witness a safety event. PG&E is preparing their Mobile App proposal and RASA staff are preparing a next steps memo. A follow up workshop to discuss PG&E's app proposal is scheduled for January 24th.
- **S-MAP Technical Working Group** – RASA staff convened Safety Model Assessment Proceeding (S-MAP) Technical Working Group (TWG) meetings. The purpose of the TWG is to develop Safety Management System metrics and update Electric Overhead Conductor metrics to the extent feasible, as discussed in the decision. The TWG includes the electric utilities (PG&E, SCE, and SDG&E) responding to comments on their proposals on how to

modify the proposed “Electric Overhead Conductor” Index and associated metrics. SED staff is drafting a proposal to select among the metrics being considered in the TWG and will introduce the staff proposal into an upcoming S-MAP rulemaking proceeding, which is expected to be opened later in the year. The TWG is also developing a uniform safety metrics reporting template that will be used when the utilities file their safety metrics reports starting in March 2020. The utilities agreed to revise the reporting template based on feedback received at the 12/4 TWG meeting. SED staff will consult with Energy Division on the logistics of the utilities filing reports with the Commission in which a mixture of pdf and spreadsheet files may be required. Parties may provide written feedback on Energy Division’s guidance document on work units.

- **Mobile Home Park Pilot Expansion (R.18-04-018) (Commissioner Rechtschaffen/ALJ Kersten):** RASA staff have provided recommendations to the ALJ on the MHP rulemaking including how to evaluate project priority and how the permanent program should be structured. The assigned Commissioner’s office conducted site visits on December 13th to view mobile home park installations before and after conversions have been implemented. A briefing meeting was held with Commissioner Rechtschaffen on December 17th where program costs were discussed. A follow up meeting is scheduled for December 20th to discuss Management Oversight, Staffing, and Coordination with HCD, Coordination with Non-Energy Service Providers and Municipal Utilities, Disadvantaged Communities, Electrification, Consumer Protections, Cost Responsibilities in the MHP Owner Agreement, Implementation and Ongoing Administration (Application Process), and Change Management (Advice Letter Process).
- **Pacific Gas & Electric TY2020 RAMP and GRC (I.17-11-003) (Commissioner Rechtschaffen/ALJ Roscow):** Pacific Gas & Electric’s TY2020 General Rate Case was filed in December. RASA staff completed a summary of the Infrastructure hardening chapter and provided comments and questions to the ALJ regarding issues with PG&E’s GRC requests. RASA staff reviewed the utility documentation that mapped the RAMP report to the GRC as well as how the SED evaluation Report recommendations were incorporated into GRC. PG&E complied with the Staff data request for spreadsheets and a compilation of RAMP-

related GRC testimony. PG&E conducted the first pre-RAMP workshop on November 14th to discuss their approach to complying with the RAMP process. On January 13th PG&E will conduct an additional workshop to discuss analytical processes they plan to incorporate in the next RAMP, which is due to be filed in June 2020.

- **Southern California Edison TY2021 GRC (A.19-08-013) (Commissioner Shiroma/ALJ Wildgrube):** SCE filed its TY 2021 GRC on 8/30/19. RASA staff is providing advisory technical support through ED including attending the 10/21/19 SCE GRC Workshop & follow-up 12/11/19 Grid Modernization Workshop. ED has requested assistance including preparation of Data Requests.

CYBER AND PHYSICAL SECURITY SECTION

SUMMARY OF RECENT ACTIVITIES

- **Critical Infrastructure National Level Exercise:** FEMA leads a National Level Exercise (NLE) every two years to bring together and strengthen the whole community by testing operational capabilities, evaluating plans and policies, familiarizing personnel with roles and responsibilities, and fostering meaningful interaction and communication across the nation. The National Level Exercise 2020 will involve a complex, adversary-based multidimensional attack that reflects the global threat environment. Widespread cyber-attacks will impact critical infrastructure, destabilize community lifelines, and lead to a domestic national security emergency that requires us to work across all levels of government, coordinate with the private sector, and engage the whole community in an all-of-nation response. Initial coordination is occurring with the Infrastructure Security & Energy Restoration (ISER), Office of Cybersecurity, Energy Security, and Emergency Response (CESER), U.S. Department of Energy on “Liberty Eclipse” on an exercise module leading into the NLE.
- **California Cyber Security Integration Center (CalCSIC):** The UCSB has completed the necessary security and background requirements to allow members of the UCSB to work in support of the California Cyber Security Integration Center, the centerpiece of the State's cyber intelligence and information sharing environment (ISE).

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 - 1/01/19 – 11/30/2019

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

