

Safety and Enforcement Division



Monthly Performance Report

October 2019

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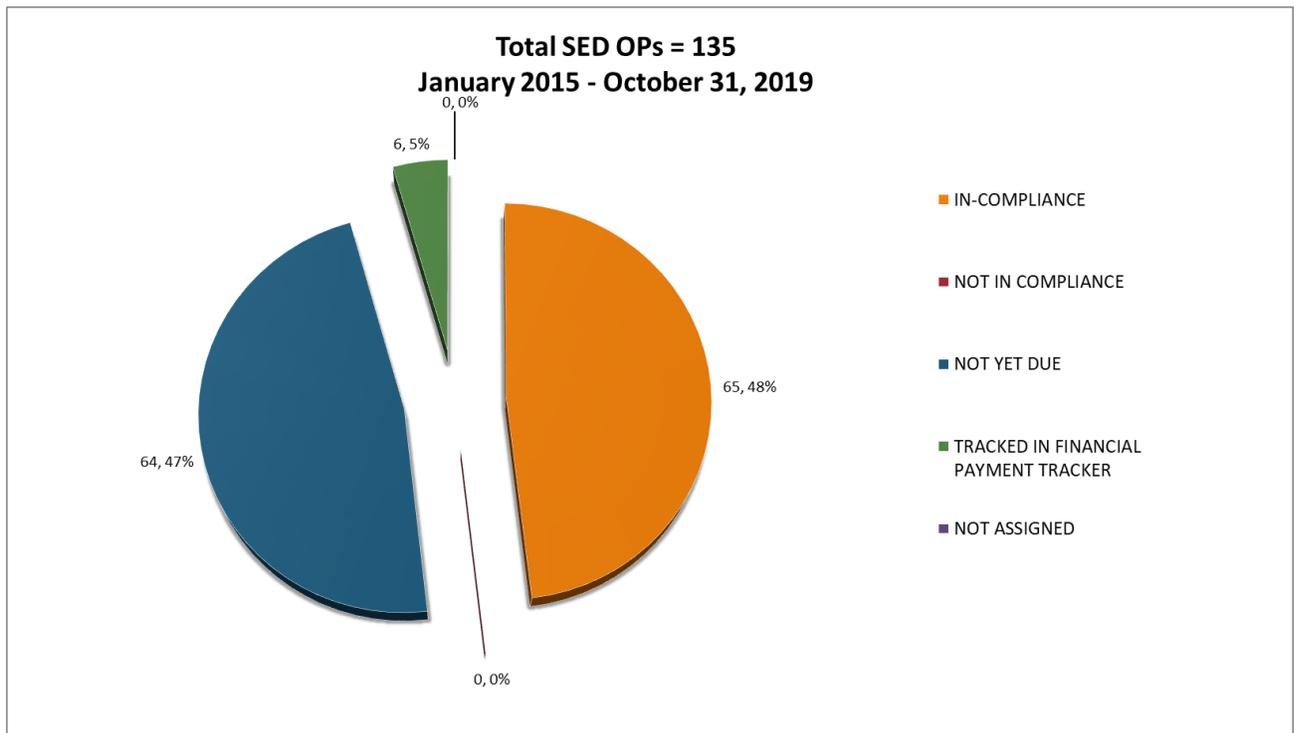
This Report has not been approved or disapproved by the CPUC.

COMPLIANCE WITH ORDERING PARAGRAPHS (COPS)

Through October 31, 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 October 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

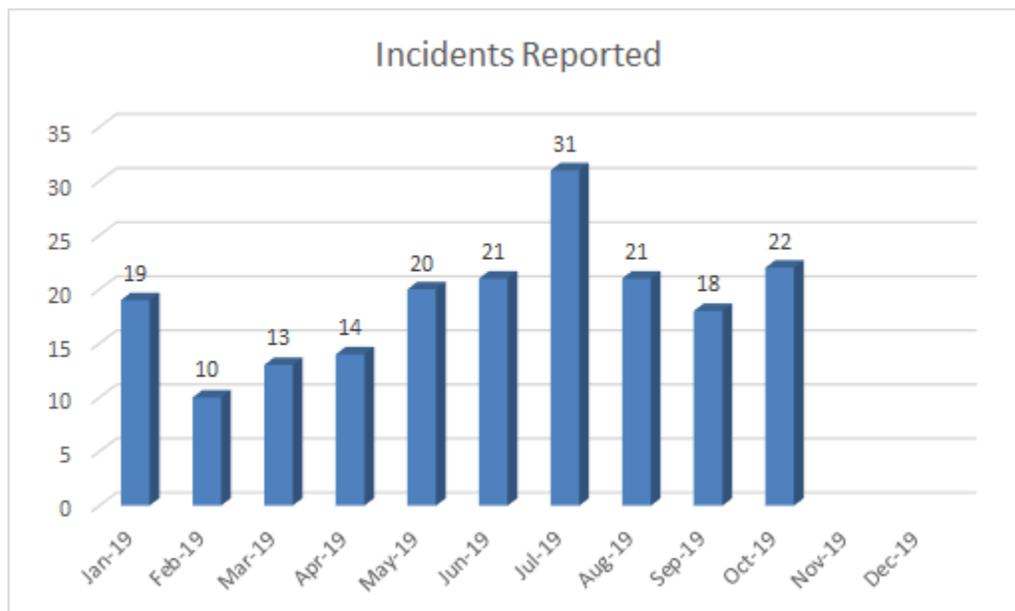
Citation Number	Utility	Amount	Violations	Date Cited	Appealed	Status
D.16-09-055 G.19-02-001	SoCalGas	\$ 3,300,000	192.13 (c), PU Code 451 & 702	2/1/2019		Active
Total Cited 2019		\$ 3,300,000				

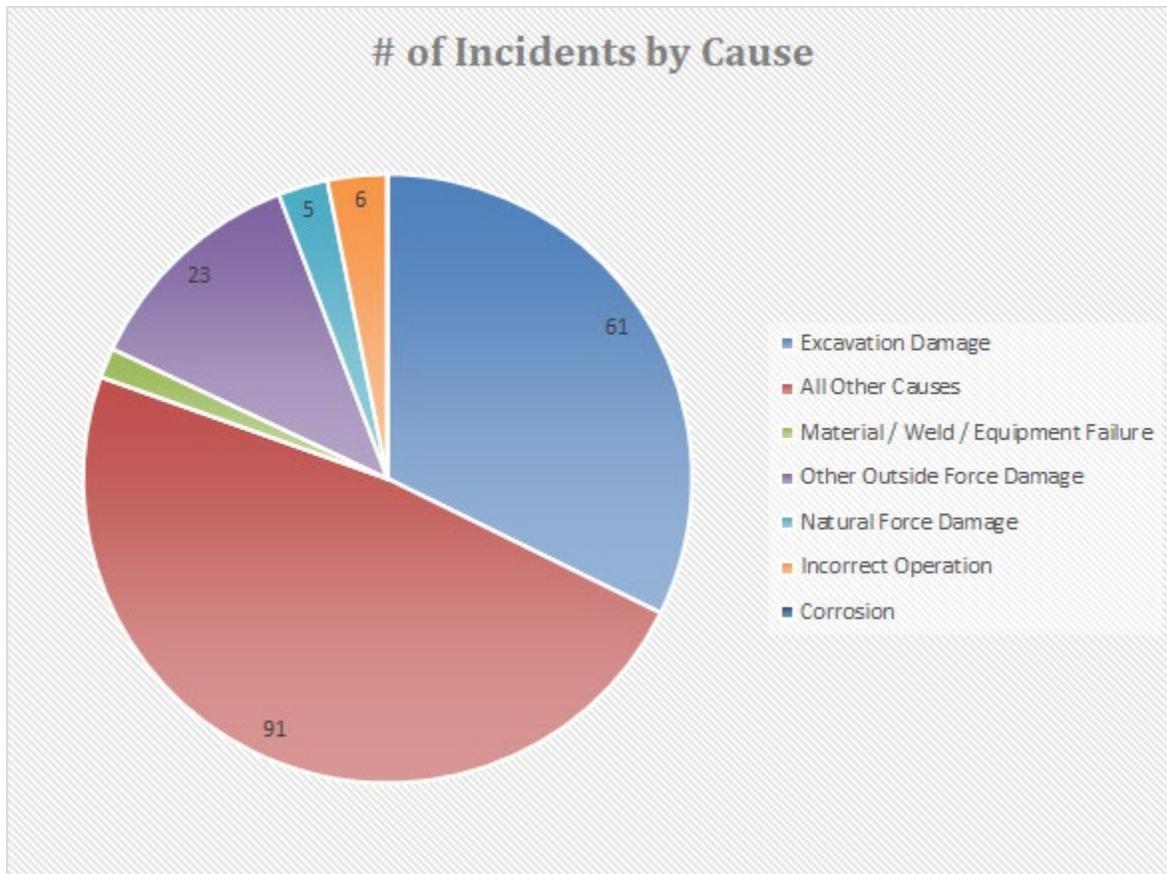
INSPECTIONS

	2019
Conducted	42
Final Report Completed	40

INCIDENT INVESTIGATIONS

As of October 30, 2019, GSRB Staff received 189 incidents year to date.





The CY 2019 incidents¹ are categorized as follows:

	Level 1	Level 2	Level 3	Level 4	TOTAL
Open	65	35	3	6	109
Closed	35	32	2	0	69
TOTAL	100	67	5	6	178

UTILITY SELF-IDENTIFIED VIOLATION (SIV) INVESTIGATIONS

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.

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 two self-identified violations reported in October.

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 October 2019, Electric Safety and Reliability Branch:

- Received 22 electric facilities incident reports and closed 7 previously reported electric facilities incident investigations;
- Investigated 75 customer safety and reliability complaints;
- Issued five Notice of Violation letters/audit reports;
- Performed two Electric Transmission audits;
- Performed one Substation audit;
- Performed three Communication Infrastructure (CIP) audits;
- Monitored seven forced outages and 13 planned outages reported by natural gas and renewable energy power plants.

Electric Facilities and Generation Incident Investigations as of October 31, 2019

ESRB		Level 1	Level 2	Level 3	Level 4	Total ²
Total open incidents	Electric Facilities	12	23	60	67	162
	Generation	0	1	1	2	4
Total incidents reported in 2019	Electric Facilities	11	25	40	34	110
	Generation	0	1	0	0	1
Total incidents closed in 2019	Electric Facilities	2	10	23	32	67
	Generation	0	0	0	0	0
Total open 2019 incidents	Electric Facilities	9	32	35	28	94
	Generation	0	1	0	1	2
Incidents reported October 2019	Electric Facilities	2	6	8	6	22
	Generation	0	1	0	0	1
Incidents closed in October 2019	Electric Facilities	0	1	1	5	7
	Generation	0	0	0	0	0

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 September 2019, the Commission hosted a three-day workshop kicking off Phase 2. In October 2019, the assigned ALJ in R.18-10-007 issued a ruling requesting party comments on the Phase 2 WMP workshops held in September 2019. On October 30, 2019, parties filed opening comments on the Phase 2 WMP workshops in accordance with the ALJ ruling. Pending.
- **Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions (R.18-12-005) (Commissioner Picker/ALJ Semcer) (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. Due to the recent PSPS events, the assigned ALJ will be issuing a ruling to halt the current procedural schedule for R.18-12-005 so that high priority issues can be addressed in the near term. The ALJ will; be issuing a scoping memo in the next two weeks outlining next steps. 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. In May 2019, parties filed comments on workshop and the questions in the scoping memo and in June 2019, parties filed reply comments. 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. Track 2 workshops will begin on November 7, 2019. Pending.

- **Proceeding to Consider Amendments to GO 95 (R.17-10-010) (Commissioner Picker/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. 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 May 1, 2019, SED and parties filed comments in response to the ruling. Currently awaiting ruling from ALJ on next steps. 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 has met with parties (either bilaterally or multilaterally) on six separate occasions. On October 4, 2019, the ALJ lead a status conference to discuss the potential motion to add additional fires to the proceeding, the status of settlement discussions, progress of the stipulation of facts, schedule and other issues. On October 11, 2019, the Chief ALJ reassigned this proceeding from ALJ Houck to ALJ Park. On October 14, 2019, SED filed its Prehearing Legal Brief regarding the seven issues put forth by the ALJ. On October 17, 2019, SED filed a motion to include the Lobo and McCourtney fires in this proceeding. On October 28, 2019, the Assigned Commissioner granted SED's unopposed motion to amend the scope to include the Lobo and McCourtney fires. On October 29, 2019, SED filed a motion seeking an extension of time for its reply to PG&E's Attachment B Report which

the ALJ granted on October 30, 2019. SED continues to work on its reply to PG&E's Attachment B Report due November 15. Pending.

- **Distributed Energy Resources (R.14-08-013) (President Picker/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). 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 Kincadee 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. On October 17, 2019, ESRB staff attended the CAISO Transmission Maintenance Coordination Committee (TMCC) quarterly meeting at Folsom. TMCC members mainly discussed SB-901 Implementation Updates:
 - The CAISO clarified that Public Safety is under CPUC jurisdiction and praised CPUC's actions.
 - SDG&E discussed funding of the independent auditors in the Wildfire Mitigation Plan implementation.

- PG&E shared its Centralized Inspection Review Team (CIRT) approach, which uses central review approach in deciding on maintenance activities. This approach will add more eyes, including engineers, subject matter experts, and first line supervisors. PG&E also explained its use of drones, helicopters, and LiDARs to conduct the inspections.
- SCE is going through effort on gaining more situational awareness on T&D such as installing cameras, weather stations, and computers to process the collected data.
- Parties discussed condition-based maintenance. In general, members in concurrence that condition based maintenance might be the best approach.

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. Staff are also working with Advisors and the ALJ on the work tasks for the additional work under the contract amendment.
- **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 has been scheduled for December 2, for the draft annual report which was published in November 2019. An 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 (upcoming application):** The OII for the proceeding has been issued. The Sempra RAMP filing is due November 30 but is expected to be published on or before December 2, 2019 since November 30, 2019 falls on a Saturday. Workshops have been scheduled for December 16 and 17th to present their RAMP.
- **Utility Poles and Conduit (I.17-06-027/R.17-06-028) (Commissioner Batjer/ALJs Mason and Kenney):** RASA, Energy, and Communications Division staff are participating in working group meetings with the IOU's and communication utilities to achieve the goals of OII. Stakeholders have prepared comments on the workplans for the 5 major pole owners Track

1. The Track 2 working group, which will address Attachment data including for joint poles, will begin in November. Workshops which were scheduled for November 19-20 have been rescheduled to January 28-29th. RASA expects to have the Communications Division take the lead role in facilitating the Track 2 working group and proceeding.
- **PG&E Mobile App Pilot (A.19-07-019) (Commissioner Rechtschaffen/ALJ DeAngelis)** In compliance with OII/Order to Show Cause, PG&E filed an application for a pilot program as to whether and how a mobile application can specifically improve public safety by reducing the risk of catastrophic wildfire associated with utility infrastructure. PG&E suggested rolling out a pilot to a limited number of users focusing on a subset of Tier 3 HFTD locations. PG&E also requested SED support including a technical workshop(s) and the implementation phase. PG&E will hold the first workshop on Tuesday, December 3rd. Staff also received input that if comments on the app identify unresolvable issues, a recommendation to terminate this pilot could be a consideration.
 - **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.
 - **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 has asked RASA to setup site visits to view

mobile home park installations before and after conversions have been implemented. A site visit has been scheduled for December 13th.

- **EV Charging Infrastructure Installation** – Utilities have submitted Advice Letters seeking approval to install EV charging infrastructure based on the installation safety checklist RASA staff developed in collaboration with Energy Division Staff. ED staff are the lead in reviewing the Advice Letters to ensure the safety checklist has been followed with RASA staff reviewing final recommendations.

- **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 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. On January 13th PG&E will conduct a workshop to discuss analytical processes they plan to incorporate the next RAMP, which is due to be filed in June 2020. PG&E filed a motion to close the previous RAMP and the ALJ issued a proposed decision to close the RAMP, which was approved by the Commission.

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.

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 – 10/31/2019

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

