

Safety and Enforcement Division



Monthly Performance Report

September 2019

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Disclaimer

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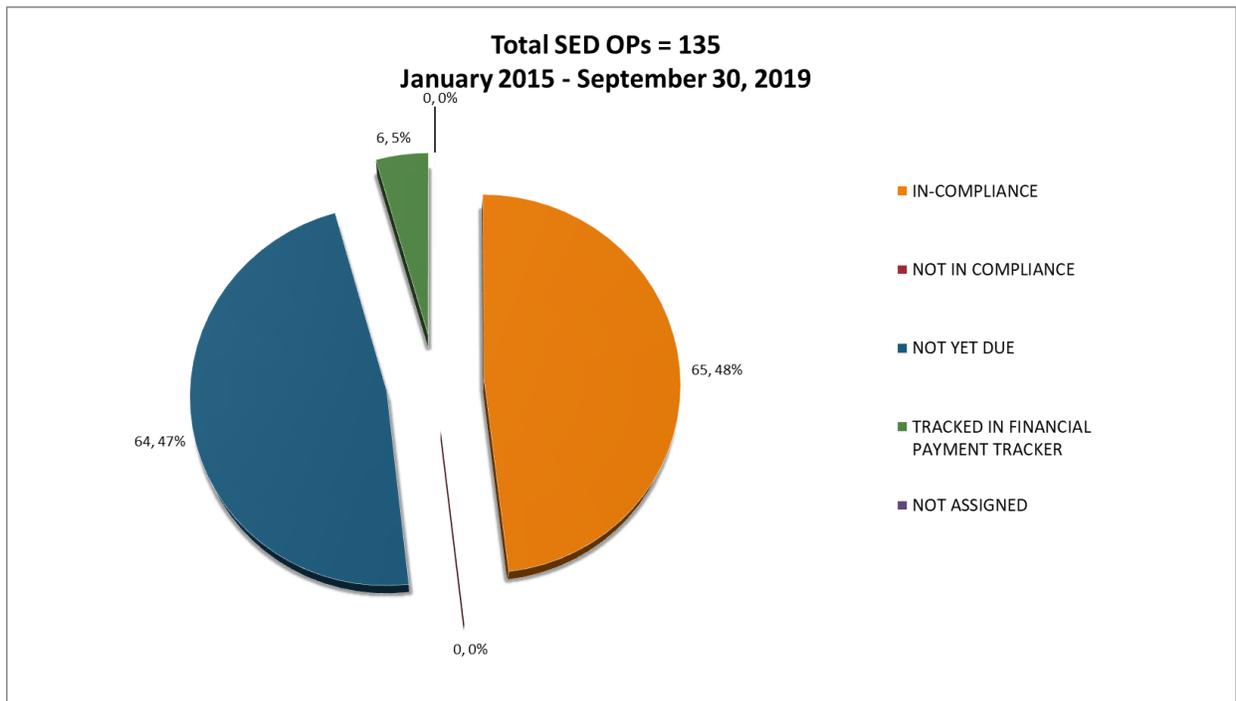
This Report has not been approved or disapproved by the CPUC.

COMPLIANCE WITH ORDERING PARAGRAPHS (COPS)

Through September 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 September 2019, there was 1 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

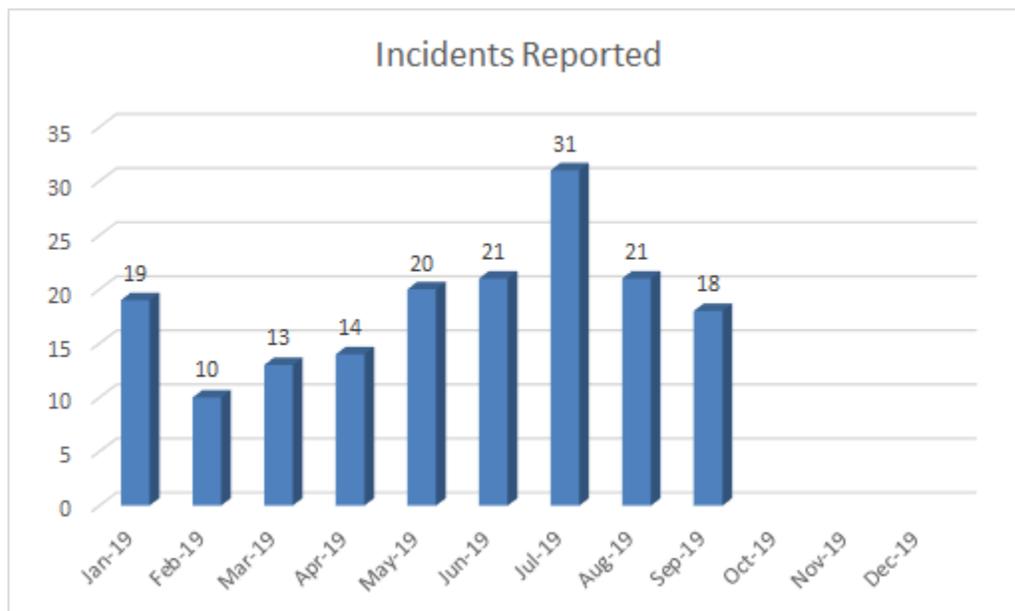
Citation Number	Utility	Amount	Violations	Date Cited	Appealed	Status
D.16-09-055 G.19-02-001	SoCalGas	\$ 3,300,000	192.13 (c), PU Code 451 & 702	2/1/2019		Active
Total Cited 2019		\$ 3,300,000				

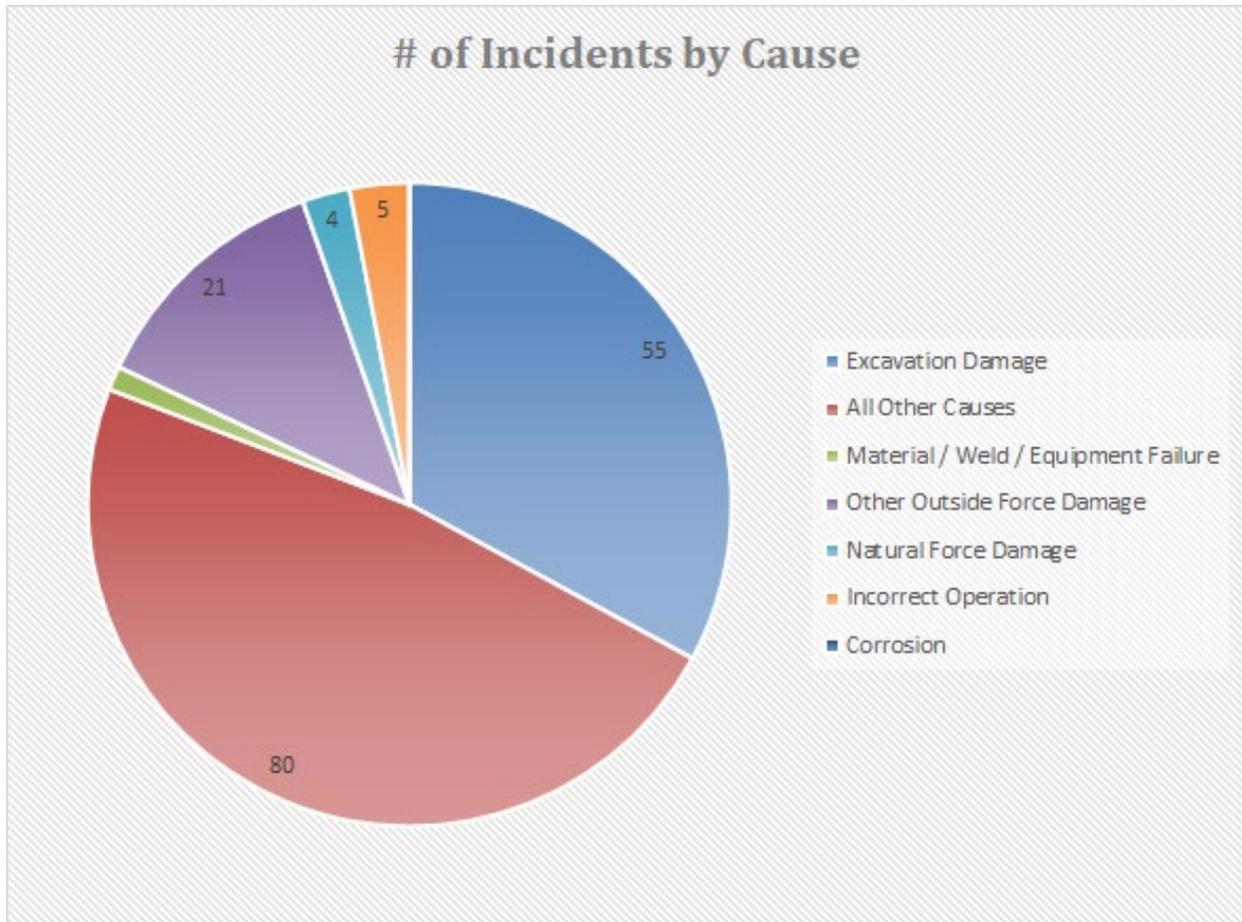
INSPECTIONS

	2018	2019
Conducted	39	40
Final Report Completed	39	28

INCIDENT INVESTIGATIONS

As of September 30, 2019, GSRB Staff received 167 incidents year to date.





The CY 2019 incidents¹ are categorized as follows:

	Level 1	Level 2	Level 3	Level 4	TOTAL
Open	57	27	3	6	89
Closed	35	32	2	0	69
TOTAL	88	59	5	6	158

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 September.

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 September 2019, Electric Safety and Reliability Branch:

- Received 12 electric facilities incident reports and closed 13 previously reported electric facilities incident investigations;
- Investigated 31 customer safety and reliability complaints;
- Issued three Notice of Violation letters/audit reports;
- Performed one Electric Distribution audit;
- Monitored six forced outages and one planned outage reported by natural gas and renewable energy power plants.

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

ESRB		Level 1	Level 2	Level 3	Level 4	Total ²
Total open incidents	Electric Facilities	9	18	53	66	146
	Generation	0	1	1	2	4
Total incidents reported in 2019	Electric Facilities	8	19	32	28	87
	Generation	0	1	0	0	1
Total incidents closed in 2019	Electric Facilities	2	9	22	27	60
	Generation	0	0	0	0	0
Total open 2019 incidents	Electric Facilities	6	17	28	23	74
	Generation	0	1	0	1	2
Incidents reported September 2019	Electric Facilities	2	5	4	1	12
	Generation	0	1	0	0	1
Incidents closed in September 2019	Electric Facilities	1	2	6	4	13
	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. In early February, Investor Owned Utilities (IOUs) filed their WMPs, starting a three-month statutory deadline for the Commission to review and approve the plans. The Commission held a series of informational and technical workshops where utilities presented their WMPs, parties asked questions about the plans, and several technical panels were arranged to discuss a variety of issues ranging from interpretation of the SB 901 statutes to the function, use, and implementation of covered conductors. 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. On the first day of the workshop, IOUs presented updates on implementation of their approved WMPs, challenges faced, and lessons learned. There was also a discussion of AB 1054 implementation and issues related to recent legislative changes. The second workshop day was entirely devoted to the topic of metrics for evaluation of WMP program effectiveness. Panel discussions included an overview of the Commission's safety performance metrics effort in the Safety Model Assessment Proceeding (SMAP) and developments currently in progress. There were also panel discussions including a variety of external experts from various industries (i.e. oil and gas, financial, etc.) discussing the application of effective metrics in their respective industries, and a party panel discussion on effective WMP metrics. The final day of workshops included a discussion on potential process changes related to WMP submittal,

review and approval. The workshop concluded with a panel discussion on in-language communication and notification for linguistically isolated communities. 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. Parties filed comments in response to the scoping memo and ESRB is currently reviewing the comments and providing advisory support to the ALJ. 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 September 6, 2019, parties re-convened for a teleconference to further discuss Track 1 Work Plans. 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. 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 September 6, 2019, the ALJ filed a ruling for parties to brief seven pre-

evidentiary hearing issues by September 30, 2019. On September 23, 2019, SED filed a motion seeking more time to: (1) file its reply to PG&E's report in response to Attachment B of this OII (Attachment B Report), (2) file a motion to include the Lobo, McCartney and Camp fires, and (3) brief pre-evidentiary hearing issues. The ALJ granted SED's time extension on September 26, 2019. Currently, SED is working on a pre-evidentiary legal brief and a reply to PG&E's Attachment B Report. 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

- **2017 and 2018 Wildfires:** In 2017 and 2018, California has experienced devastating wildfires. In Northern California, the Camp Fire burned about 153,000 acres in November 2018, destroyed an estimated 18,000 structures, injured three firefighters, and unfortunately resulted in 86 civilian fatalities. In Southern California, the Woolsey Fire burned about 100,000 acres in November 2018, destroyed an estimated 1,800 structures, injured three firefighters, and unfortunately resulted in three civilian fatalities. SED investigatory teams have been assigned and have visited the sites of areas affected by the

2017 and 2018 wildfires to examine evidence related to utilities' facilities. 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. On September 11, 2019, SED staff visited the GGNRA again and observed sample picking for the old towers and insulators that were removed from the IAS Lines. 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 have prepared a \$3MM contract/amendment for NorthStar to conduct additional analysis for Phase 2 of the proceeding. The contract amendment has been approved by the Department of General Services. Staff are working with Advisors on the work tasks to begin 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, and start work drafting the annual report due November 15, 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. A technical working group (TWG) meeting was held October 21st per the Decision and the focus is on developing a process for updating Emissions Factors used for quantifying emissions. The TWG discussions resulted in modification to 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):** RASA staff met a second time with Sempra in preparation of Sempra's submission of their next RAMP and discussed staff assignments to analyze the Sempra RAMP. The OII for the proceeding has been issued (Proceeding number to be updated). The Sempra RAMP filing is expected on or before December 2, 2019 since November 30, 2019 falls on a Saturday.

- **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. In August 2019, a two day in-person workshop was conducted to discuss the current pole databases and the criteria and elements that should be included in all pole databases. Stakeholders have prepared a workshop report with the 5 major pole owners Track 1 work plans and is expected to be filed on October 1, 2019. The Track 2 working group, which will address Attachment data including for joint poles, will begin in November including a November 7th morning WebEx and November 19-20th Workshop.
- **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. RASA staff met with the ALJ and advisors to discuss proceeding on this application and have scheduled the first workshop for 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 meeting 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.

- **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 was scheduled but was not completed and will have to be rescheduled.
- **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 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. In January PG&E conducted a workshop that walked through how they incorporate the RAMP in the GRC. The ALJ over the GRC proceeding determined that PG&E should file a motion to close the RAMP, with RASA making a final review for any outstanding issues. Staff issued its comments and findings to PG&E on March 19, 2019, signifying that a motion to close the RAMP proceeding is appropriate at this time. PG&E filed a motion to close the RAMP and the ALJ issued a proposed decision to close the RAMP, which was approved by the Commission.

Energy Division staff have asked RASA staff to help summarize the Infrastructure hardening chapter and provide comments and questions to the ALJ regarding any issues with PG&E's GRC requests. Staff completed the summary and have been following the proceeding to provide input as appropriate.

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 – 9/30/2019

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

