

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 17, 2020

E-mail transmission only

Dan Marsh
Liberty Utilities
933 Eloise Avenue
South Lake Tahoe, CA 96150
Dan.Marsh@libertyutilities.com

Robert Kenney
Pacific Gas & Electric Company
P. O. Box 770000, Mail Code B23A
San Francisco, CA 94177
KSRA@pge.com

Timothy K. Clark
PacifiCorp
1407 W. North Temple, Suite 320
Salt Lake City, UT 84119
tim.clark@pacificorp.com

Carla Peterman
Southern California Edison
8631 Rush Street
Rosemead, CA 91770
carla.peterman@sce.com

SUBJECT: Spatial Data Submission Pursuant to WSD Quarterly Report and Guidance

Dear Electrical Corporation Representatives:

The Wildfire Safety Division (WSD) hosted a virtual workshop series on August 11 and 12, 2020 covering proposals for the 2021 Wildfire Mitigation Plan (WMP) Guidelines and Tables, 2021 WMP Data Schemas for spatial data reporting, and the Safety Culture Assessment process. Prior to these workshops, on August 5, 2020, the WSD issued a series of documents to electrical corporations and the service list of Commission proceeding R.18-10-007. Included in these files was a document titled, "WSD GIS Data Reporting Standards_DRAFT_20200805.pdf." Following discussion at the August 11-12th workshop, the WSD acknowledged that due to time constraints and the desire to facilitate the production of spatial data as soon as possible, the WSD would allow for partially complete spatial data submissions from electrical corporations, but would

Dan Marsh
Liberty Utilities
Robert Kenney
Pacific Gas & Electric
Timothy K. Clark
PacifiCorp
Carla Peterman
Southern California Edison

SUBJECT: Spatial Data Submission Pursuant to WSD Quarterly Report and Guidance

September 17, 2020

Page 2

require a “status tracker” submission concurrently to allow clear and transparent insight into the process. Additionally, to aid electrical corporations in complying with the structural requirements in the WSD spatial data schema, the WSD also indicated that it would provide electrical corporations with file geodatabase (GDB) templates that meet the WSD’s expectations and requirements for structure and metadata.

On August 21, 2020, the WSD provided electrical corporations with the following files:

1. WSD GIS Data Reporting Standards_DRAFT_20200821.pdf – a slightly modified version of the document provided on August 5, 2020 ahead of the WSD workshops.
2. WSD_GIS_DataSchema_StatusReport_20200909.xlsx” – the “status tracker” referenced above.
3. WSD_GdbTemplate_2020.zip – a zipped folder of GDB files customized for each respondent electrical corporation and compliant with the WSD’s draft data schema and spatial data requirements.
4. WSD_DataDictionary_2020.zip – a zipped folder containing customized data dictionaries for each respondent electrical corporation that compliment the file GDB templates.
5. WSD GIS Data Preparation & Submittal Guidance_20200821.pdf – providing guidance for satisfactorily completing the GDB and status tracker files, as well as submitting photos and file naming conventions.

The document titled, “WSD GIS Data Reporting Standards_DRAFT_20200821.pdf” (hereafter “Draft Data Standards”) provided clear instructions on the submittal of spatial data required on September 9, 2020 as part of the first quarterly report required by Resolution WSD-002. Section 2.5 of the Draft Data Standards document titled, “Actual Submission,” indicated that data submissions should be transmitted via the Commission’s secure file transfer portal – Kiteworks – and provided the following additional instructions:

Electrical corporation data submissions through Kiteworks must be sent to the following email account: WildfireData@cpuc.ca.gov.¹

In accordance with the schedule in Resolution WSD-002, quarterly reports and accompanying spatial data submissions were submitted by respondent electrical corporations on September 9, 2020. However, most respondent electrical corporations did not follow the WSD’s instructions

¹ WSD GIS Data Reporting Standards_DRAFT_20200821.pdf at p. 4.

Dan Marsh
Liberty Utilities
Robert Kenney
Pacific Gas & Electric
Timothy K. Clark
PacifiCorp
Carla Peterman
Southern California Edison

SUBJECT: Spatial Data Submission Pursuant to WSD Quarterly Report and Guidance

September 17, 2020

Page 3

for submission of spatial data in accordance with the language quoted above. As a result, the spatial data submissions were received in disparate locations via Kiteworks that are not readily accessible to the WSD. Accordingly, to date, the WSD has only been able to verify that a complete quarterly report data submission was made by San Diego Gas & Electric (SDG&E).² A complete quarterly report data submission consists of the following:

1. A complete set of GDB files, in accordance with the customized GDB templates provided on August 21, 2020.
2. A completed "status tracker," in MS Excel format, completed in accordance with the instructions provided in the "WSD GIS Data Preparation & Submittal Guidance_20200821.pdf" document.

Other than SDG&E, respondent electrical corporations have either not submitted the required files identified above or submitted the required files via Kiteworks to a location other than an email to the WildfireData@cpuc.ca.gov inbox.

This delay in properly submitting the required data in accordance with previously provided instructions has resulted in an inability for the WSD to access and review these filings. The WSD considers the failure to comply with simple submittal instructions and the resultant unnecessary delays in reviewing the data a serious failing on the part of the electrical corporations to comply with the conditional approvals issued for 2020 WMPs.

Pursuant to California Public Utility Code §§313, 314, 701 and 8386(c)(22), electrical corporations are expected to provide information requested by the CPUC. Delays in receiving this critical information prevents the WSD from finding electrical corporations in compliance with their respective WMP conditions of approval. As such, all respondent electrical corporations, with the exception of SDG&E, are directed to submit their respective GDB files and status tracker (in MS Excel format) via Kiteworks to the WildfireData@cpuc.ca.gov inbox within one business day from the issuance of this letter. Failure to comply with these instructions may result in enforcement action under California Public Utility Code §8389(g).

² SDG&E is the only respondent electrical corporation that submitted the required files via Kiteworks to the WildfireData@cpuc.ca.gov inbox.

Dan Marsh
Liberty Utilities
Robert Kenney
Pacific Gas & Electric
Timothy K. Clark
PacifiCorp
Carla Peterman
Southern California Edison

SUBJECT: Spatial Data Submission Pursuant to WSD Quarterly Report and Guidance

September 17, 2020

Page 4

If you have any questions regarding this letter, please contact Koko Tomassian at koko.tomassian@cpuc.ca.gov.

Sincerely,



Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission

cc: Christopher Meyer, Program Manager, WSD
cc: Koko Tomassian, Program Project Supervisor, WSD
cc: Diana Gallegos (*Diana.S.Genasci@sce.com*)