



**Wildfire Safety Division  
Staff Proposal on Changes to Wildfire Mitigation  
Plan Requirements and Metrics Tables**

**August 11, 2020**

**STAFF REPORT**



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# EXECUTIVE SUMMARY

In order to streamline and clarify certain reporting requirements for the 2021 Wildfire Mitigation Plans (WMP), and to fill in some identified gaps in data submissions, staff of the Wildfire Safety Division (WSD) have reviewed the WMP Guidelines and recommend several changes.

These changes take the form of **Structural** changes (reordering sections to improve the ability to evaluate WMPs, adding some new elements), and **Substantive** changes to the tables of data and metrics.

A major structural change is creation of a separate section for Public Safety Power Shutoff data and information as the last chapter of the WMP. Data for this section would be in tables that previously appeared in the Outcome Metrics Table 2.3 and 2.10 and in Table 12 of the WMP and in several table that were part of the Supplemental Data Request (SDR), notably Tables 2, 5, 11, 12 & 13, although some of this is duplicative of the information contained in the WMP tables. A few other higher level SDR tables are also considered for incorporation into the 2021 WMP update. These recommended changes are described below.

An issue with the 2020 WMPs was that utilities were inconsistent in their reporting of projected expenditures associated with the 10 categories of Mitigations. In some cases, few cost estimates were given; in others, there appeared to be overlap and duplication among categories.

Although the WMP is not the proper forum for approving projected expenditures or finding them to be reasonable for cost recovery purposes, understanding expected costs of mitigation is fundamental to the analysis of effectiveness and feasibility, as well as an essential component of the risk-spend efficiency estimations required for all mitigations.

Therefore, WSD staff is proposing a new section that summarizes proposed expenditures for the 2021 WMP update and breaks out spending by mitigation category.

While several other new elements may be added to the Guidelines<sup>1</sup>, the majority of changes relate to definitions and/or units of measurement used in reporting. Others result in the elimination of duplicate tables or line items in tables that are not necessary for 2021 WMPs.

Particular attention is given to the Progress and Outcome reporting Tables 1 – 18, as these establish the body of metrics that will be used for evaluation of utility progress in reducing the risks and consequences associated with utility-caused wildfires.

The recommendations below are a DRAFT of the 2021 WMP recommendations and NOT exhaustive.

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<sup>1</sup> Link to 2020 WMP Guidelines can be found here - <https://www.cpuc.ca.gov/wildfiremitigationplans/>

# Overview of WMP Recommendations

The WSD, by October 31, 2020, will issue a Resolution containing proposed updated Guidelines for the 2021 Wildfire Mitigation Plans for action by the Commission by December 1.

While this document is largely concerned with proposed changes to the Guideline structure and Tables of Metrics in the WMP, the revised Guidelines will consider several new additions to the WMP, based on lessons learned in the 2020 WMP review process, recommendations from the Wildfire Safety Advisory Board, comments received on the 2020 Guidance ruling issued in Rulemaking 18-10-007 on December 16, 2020,<sup>2</sup> workshop discussion and comments, and the input from the Subject Matter Experts who assisted in the WSD's evaluation of the 2020 WMPs.

This document is organized by section in the WMP, including new sections to the guidelines to meet stakeholder needs. Across Guideline sections, there are nine key areas of revision (listed below). Stakeholders are encouraged to provide written comments on or before August 26<sup>th</sup>, 2020 through email to [wildfiresafetydivision@cpuc.ca.gov](mailto:wildfiresafetydivision@cpuc.ca.gov) and to service list 18-10-007. Written comments across all content in the August 11-12, 2020 workshop is limited to 20 pages total.

## **Nine objectives for revision of the WMP guidelines**

1. Standardize Data Across Utilities
  - Streamlined reporting and improved cross-utility comparisons
2. Require Consistent and Transparent Summaries
  - More consistent formatting
  - Completeness check template
3. Require Local Outreach and Outcome Metrics
  - PSPS reduction plans
  - Community Outreach
4. Require Ratepayer Impacts
  - Summaries of Mitigation Expenditures
  - Planned Spending by Mitigation Categories
  - Ratepayer Impact Projections
5. Improve Guidance for Goals, Objectives and Program Targets Reporting
6. Cite Relevant Statutes and Orders throughout Guidelines
7. Require Utility Training Practices
8. Require Contact Information and Qualifications
9. Create Separate Public Safety Power Shutoff Section

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<sup>2</sup> Comments were received in January 2020

## **A. WMP Section 1: Persons responsible for executing the WMP**

**Issue:** In the initial filing of 2020 WMPs, most utilities did not fully identify the individuals responsible for components of the WMP, necessitating a follow-up data request or revision.

### **Recommendations:**

- **Recommended change 1a:** Provide contact information of the responsible person(s) executing the plan, including
  - Executive level with overall responsibility, with contact information (telephone and email).
  - Program owners, individually identified with contact information (telephone and email) specific to each component of the plan
- **Recommended change 1b:** All experts consulted in the preparation of the WMP should be cited by name and include their relevant background/credentials.

**Note:** Contact information deemed confidential may be provided in a redacted supplement.

## **B. NEW: WMP Section 2: Adherence to statutory requirements**

**Issue:** Section 8386 (c) of the Public Utilities Code specifies 22 requirements for inclusion in the WMPs. WSD conducted a first-step “completeness” review to ensure required information was included in the WMPs, there were many instances where information was lacking or difficult to find in the WMP. This necessitated a very large volume of Data Requests before WSD could begin verifying that the plans complied with all applicable rules, regulations, and standards, as specified in Section 8386 (d).

### **Recommendations:**

- **Recommended change 2a:** Section 2 will comprise a “check list” of the Sec. 8386 (c) requirements, and subparts. Each utility shall both affirm that the WMP addresses each requirement AND cite the Section or Page Number where it is more fully described (whether in Executive Summary or other section of the WMP).

Illustrative Table 2-1 check-list:

<b>Requirement</b>	<b>Description</b>	<b>WMP Section/Page</b>
2	The objectives of the plan	Section 4.1 Page 13
10	Protocols for the de-energization of the electrical corporation’s transmission infrastructure, etc.	Section 5 overview, pg. 30

### C. **NEW** Section 3: Actuals and Planned Spending for Mitigation Plan

**Issue:** In the 2020 WMPs, utilities presented inconsistent reporting of projected expenditures associated with the 10 categories of Mitigations. In some cases, few cost estimates were given, in others there appeared to be double-counting of expenditures among categories.

Although the WMP is not the proper forum for approving projected expenditures or finding them to be reasonable for cost recovery purposes, understanding expected costs of mitigation is fundamental to the analysis of effectiveness and feasibility, as well as an essential component of the risk-spend efficiency estimations required for all mitigations.

#### **Recommendations:**

- **Recommended change 3a:** Add summary tables presented below, new to the 2021 WMPs, but derived from the cost summary tables used in the WMP resolutions. In the new Table 3-1, the projected costs are summarized per year over the three-year WMP cycle, but the table also includes a new column to report actual expenditures for the prior year (2020). Table 3-2 breaks out projected costs per category of mitigations, over the three-year WMP cycle.

<b>Table 3-1: Summary of WMP Expenditures</b>	
<b>2020 WMP</b>	\$3.15 billion
<b>2020 act.</b>	\$3.14 billion
<b>Difference</b>	-\$10 million
<b>2021</b>	\$3.13 billion
<b>2022</b>	\$3.41 billion
<b>2020-22</b>	\$9.68 billion

<b>Table 3-2 Summary of WMP Expenditures</b>						
<b>WMP Category</b>	<b>2020 WMP Planned</b>	<b>2020 Actual</b>	<b>Difference</b>	<b>2021</b>	<b>2022</b>	<b>2020-22 (w/ 2020 Actual)</b>
<b>Risk and Mapping</b>						
<b>Situational Awareness</b>						
<b>Grid Design &amp; System Hardening</b>						
<b>Asset Management &amp; Inspections</b>						
<b>Vegetation Management</b>						
<b>Grid Operations</b>						
<b>Data Governance</b>						
<b>Resource Allocation</b>						
<b>Emergency Planning</b>						
<b>Stakeholder Cooperation Community Engagement</b>						
<b>Total</b>						

- The 2021 WMP will be more direct in requiring risk-spend efficiency calculations for mitigations, both for individual mitigations and for aggregated categories of mitigations. Along with RSE calculations, utilities will be required to report their methodology behind RSE numbers, including data used & calculations conducted to reach RSE in the WMP.
- **Recommended Change 3b:** WMP to also include fields from the Supplemental Data Request that are relevant to Costs:
  - SDR Table 2 Field 3a - Electricity Cost Increase to Ratepayers from Wildfires
  - SDR Table 2 Field 3c - Electricity Cost Increase to Ratepayers from Mitigations
  - Fields are shown below for reference

	Annual performance					
Outcome metric name	2016	2017	2018	2019	2020	Unit(s)
Increase in electric costs to ratepayer due to wildfires (total)						Dollar value rates increase attributable to wildfires per year
Increase in electric costs to ratepayer due to wildfire mitigation activities (total)						Dollar value rates increase attributable to WMPs per year

**D. NEW Section 4: Lesson Learned and Risk Trends**

**Issue:** Section 4 in the WMP currently serves as a catch-all for narrative and reporting of trends. Section 4 should be more focused to improve evaluation process. Moreover, relevant narrative portions to risk trends, such as “Lessons learned” were either missing or placed within the larger narrative portion of Section 2 Metrics.

**Recommendations:**

- **Recommended Change 4a:** Move “Lessons Learned” into Section 4 with no changes to the instructions.
- **Recommended Change 4b:** Keep the following sections in Section 4:
  - 4.1 – Objectives of the plan (1, 3, and 10 years out)
  - 4.2 – Understanding major trends impacting ignition probability and wildfire consequence
  - 4.3 – Change in ignition probability drivers
- **Recommended Change 4c:** Move 4.4 – Directional Vision for PSPS and Table 20 to PSPS section.

**E. Section 5: Inputs to the plan and directional vision for WMP**

**Goals, Objectives and Targets**

**Issue:** In the 2020 WMPs, utilities were inconsistent in usage of the words: WMP Goals, Objectives, and Program Targets.

**Recommendations:**

- **Recommended Change 5a:** The goals of WMP should be the same for all: Documented reductions in the number of wildfires caused by utility actions or equipment and minimization of the societal consequences of both wildfires and the mitigations employed to reduce them, including PSPS.

- **Recommended Change 5b:** Objectives are unique to each utility and reflect the 1, 3, and 10-Year projections of progress towards the WMP goal. Objectives are determined by the portfolio of mitigation strategies proposed in the WMP.
- **Recommended Change 5c:** Program targets: quantifiable measurements of activity used to show progress towards reaching the objectives. More information on program targets can be found in 2020 WMP Table 4 – List and Description of Program Targets, Last 5 Years.

### **Addition to Section 5.5: Utility Worker Qualifications**

**Issue:** Previous WMP reports lacked information on qualifications of utility workers (direct employees, contractors, etc.), as well as information on utility training programs to properly train wildfire mitigation workers.

- **Recommended change 5b:** Section 5.5, Planning for Workforce and Other Limited Resources, will also include a narrative explaining the qualifications of utility workers regarding wildfire & PSPS mitigation, including workers conducting:
  1. Vegetation inspections
  2. Vegetation management projects
  3. Asset inspections

Within the narrative, information should also be provided on the percentage of electrical workers that have attained status as “Qualified Electrical Workers” (QEW)<sup>3</sup> for specific inspections.

Additional information should be provided on any plans to improve qualifications of workers relevant to wildfire / PSPS mitigation. Furthermore, utilities should also report how their training programs properly train wildfire mitigation workers. Specifically, utilities should explain how they are developing more robust outreach and onboarding training programs for new electric workers that train workers to identify hazards that could ignite wildfires. Wildfire mitigation worker safety should include training so that qualified electrical workers are knowledgeable in the construction and operation of equipment and work methods to identify and avoid electrical hazards.

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<sup>3</sup> Electrical asset inspectors with qualifications that go beyond a basic knowledge of General Order 95 requirements, to perform certain types of inspections. More information can be found in the WSAB Recommendations on the 2021 Wildfire Mitigation Plan Guidelines, Performance Metrics and Safety Culture, recommendation 2.2.

## F. Section 6: Metrics and Underlying Data

**Issue:** The 2021 WMPs will continue to require reporting on Progress Metrics and Outcome Metrics; however, in some instances, the WSD determined that the metrics were misunderstood or poorly reported by utilities and were less useful than expected.

In this case, more discussion or refinement of definition or description is needed, which may be best discussed in the workshop setting.

In a few cases, a specific Table or line item can be added, edited, or eliminated. Some examples of general edits are shown below: (not comprehensive, see write up of each table below for details):

- The table or specific data inputs are duplicative of other tables (Table 18 Ignition Drivers);
- Geospatial data is required at a higher granularity to provide metrics at a local level – per WSAB recommendation;
- Refinement of the data schema will allow WSD staff to do normalization of data without relying on the utilities to do so in tables (Portions of Table 2);
- Tables that required a five-year history of certain data may need only the Year 2020 updates, if WSD creates an accessible database of the historic information (Table 2);
- Going forward, most data requirements will likely be submitted to the WSD on a quarterly basis, and the annual WMP updates will provide the narrative to explain changes in the data. Much of the data currently reported in the WMPs will therefore come outside of the WMP submission itself.
- Some tables ask for information that is better derived from other sources such as Incident Reports to CPUC (Table 5 Accidental Deaths);
- Some requested information does not lend itself to inputs to a table, but better in narrative (Table 7 Methodology).

The following are brief descriptions of proposed changes to specific tables:

## Progress Metrics

### Table 1: Grid Condition Findings from Inspections –

**Issue:** As WSD received mixed or poor results from utilities on grid condition findings, adjustment is necessary for 2021.

As formulated, the metric does not account for the effectiveness of inspections because the numbers are normalized by total circuit miles, not circuit miles inspected.

In addition, 2020 WMPs lacked relevant progress metrics for community outreach.

#### Recommendations:

- **Recommended change 1a:** Remove “findings / total circuit miles” metric, and instead request two metrics for each inspection type and finding level –
  - # of findings by inspection type and level (e.g., Level 1 findings inspected from patrol inspections)
  - # of circuit miles inspected by inspection type (e.g., X miles inspected from patrol inspections)
  
- **Recommended change 1b:** Delete line 3 - Grid Modernization (should be reported in the Mitigation section, although it was meant to illustrate “sectionalization” in PG&E territory, so not relevant for others) and Delete line 4 - Data Collection (little useful data provided in tables).
  
- **Recommended Change 1c:** Consider Possible additions from the Supplemental Data Request that are relevant to Costs
  
- **Recommended change 1d:** Add relevant quarterly metrics regarding community outreach:
  - # of customers in an evacuation zone<sup>4</sup> for a utility-ignited wildfire (if customer was in an evacuation zone for multiple wildfires, count the customer for each relevant wildfire)
  - # of customers notified of evacuation orders (count customer multiple times for each unique wildfire of which they were notified. Do not count a customer multiple times if contacted multiple times about the same wildfire)
  - % of customers notified of evacuation in evacuation zone of a utility-ignited wildfire

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<sup>4</sup> Areas designated by CAL FIRE and local fire agency evacuation orders, to include both “voluntary” and “mandatory” in addition to other orders such as “precautionary” and “immediate threat”.

## Outcome Metrics

### Table 2: Recent Performance on Outcome Metrics –

Overall, the data for subheadings in Table 2 are useful and auditable, although it may not be necessary to have utilities report past five years if a database exists.

#### 2.1. Near Misses

**Issue:** The Near Misses definition needs refinement.

In the 2020 Guidance, Near Misses were defined: “An event with significant probability of ignition, including wires down, contacts with objects, line slap, events with evidence of significant heat generation, and other events that could cause sparking or have the potential to cause ignition.”

#### **Recommendation:**

- **Recommendation 2a:** Instead, WSD suggests changing Near Misses to “Near Ignitions” defined as “Events that manifest in charring, melting, heavy smoke deposits, and/or visible evidence of arching that could indicate enough heat was present, which could have led to an ignition.”

#### 2.2. Utility Inspection Findings

**Issue:** As with 1c, the metrics don’t account for the effectiveness of inspections because they were normalized by total circuit miles rather than total circuit miles inspected. Moreover, several normalization errors on utility-reported data lead to difficulties comparing metrics across utilities.

#### **Recommendations:**

- **Recommended Change 2b:** Remove “findings / total circuit miles” metric, and instead request two metrics for each finding level –
  - # of findings by level (e.g., Level 1 findings)
  - # of circuit miles inspected (e.g., X miles)
- **Recommended Change 2c:** WSD will conduct normalization calculations across utilities.

#### 2.3. Customer Hours of PSPS

**Issue:** Need to ensure consistency in the reporting of unplanned outages.

**Recommendation:**

- **Recommended Change 2d:** This should be made a separate table and combined with Table 12 PSPS data and moved to the separate PSPS section.

**2.4. Utility Ignited Wildfire Fatalities**

**Issue:** Missing accounting of injuries reported from wildfires, and no citation to disaggregated data.

**Recommendation:**

- **Recommended Change 2e:** Add new row to report aggregate numbers for injuries attributed to utility-ignited wildfires and cite to Incident Reports for disaggregated data of fatalities and injuries in Appendix.

**2.5. Accidental deaths resulting from utility wildfire mitigation initiatives**

**Issue:** Phrasing - Deaths are presumed to be accidental

**Recommendation:**

- **Recommended Change 2f:** Drop word Accidental, change to Fatalities.

**2.8. Number of Structures Destroyed**

**Issue:** Reporting of critical infrastructure damaged not included in prior WMP

**Recommendation:**

- **Recommended Change 2h:** Add reporting of critical infrastructure damaged or destroyed by wildfires

**2.10. Number of utility wildfire ignitions**

**Issue:** No need to disaggregate by HTFD if spatial data already provides information

**Recommendation:**

- **Recommended Change 2i:** Remove HFTD disaggregation in ignition field.

**2.11 Critical Infrastructure Impacted by PSPS**

**Issue:** Normalization numbers raised unnecessary confusion and calculation errors

**Recommendations:**

- **Recommended Change 2j:** Delete line item for normalization.
- **Recommended Change 2k:** Consolidate with Table 12 as a stand-alone PSPS table.

If all the above changes are adopted, Table 2 would be significantly different. The new example Table 2, reflecting the proposed changes, is below. It only reflects the most current data, normalization is deleted and PSPS data is moved to the PSPS section.

Metric	#	Description	2019	2020	Units	Comments
1. Near Misses	1a	Number of all events (under revised definition)			Number per Year	normalized rows deleted
	1b	Number of wires down (total)			Number per year	
2. Utility Inspection Findings	2a	Number of Level 1 findings, etc.			Number of Level 1 findings	
	2b	Level 2 findings			Number of Level 2 findings.	
	2c	Level 3 findings			Number of Level 3 findings.	
	2d	Circuit miles inspected			Circuit miles	Row added
3. Customer Hours of PSPS	3a -3e				Hours per year	Moved to PSPS section, normalized rows deleted
4. Utility Ignited wildfire fatalities	4a	Fatalities (total)			Fatalities per year	normalized rows deleted
	4b	Injuries (total)			Injuries reported per year	Row added
5. Deaths from mitigation initiatives	5a	Deaths due to mitigation activities			Deaths per year	normalized rows deleted
6. OSHA reportable injuries	6a	Injuries per year				normalized rows deleted
7. Value of Assets destroyed	7a	Value of Assets destroyed by utility ignited wildfire				normalized rows deleted

Metric	#	Description	2019	2020	Units	Comments
8. Structures Damaged	8a	Number of Structures Damaged by utility ignited wildfire				normalized rows deleted
9. Acreage Burned	9a	Acreage burned by utility ignited wildfire				normalized rows deleted
10. Number of Utility wildfire ignitions	10a	Number of Ignitions (total)				normalized rows deleted and removed HFTD specification
11. Critical Infrastructure Impacted	11a	Impacted by PSPS				Moved to PSPS section, normalized rows deleted

**Table 3: Additional Metrics –**

**Issue:** Data reported in this table was highly inconsistent among utilities and did not necessarily lead to usable data.

**Recommendation:**

- WSD to standardize table for utilities to describe additional metrics. Similar to Table 3 in 2020 WMP.

**Table 4: Program Targets –**

**Issue:** Great variation among utilities makes for difficulty in assessing items.

**Recommendation:**

- See program target definition above

**Table 5: Accidental Deaths due to Mitigations –**

**Issue:** Phrasing of “Accidental Deaths...”. Also Table 5 needs clarification of what is meant by “wildfire mitigation initiatives” in instructions.

**Recommendation:**

- **Recommended Change 5a:** Change language to “Fatalities & injuries associated with all initiatives reported in the previous WMP.”

**Table 6: OSHA Reportable Injuries due to Mitigations**

**Issue:** Table 6 needs clarification of what is meant by “wildfire mitigation initiatives” in instructions

**Recommendation:**

- **Recommended Change 6a:** Change language to “Injuries associated with all initiatives reported in the previous WMP.”

**Table 7: Methodology** - Low priority for change, except it might be better in narrative than in table.

**Table 8: Map File Requirements for Weather Conditions**

**Issue:** Mapping data not appropriate for WMP tables but for GIS data

**Recommendation:**

- **Recommended Change 8a:** Eliminate table; Not appropriate for WMP tables but part of GIS data

**Table 9: Map File Baseline**

**Issue:** Mapping data not appropriate for WMP tables but for GIS data

**Recommendation:**

- **Recommended change 9a:** Same as for Table 8, Eliminate

**Table 10: Weather**

**Issue:** Inconsistent weather reporting from utilities. Utilities used proprietary methodologies for weather calculations (e.g., RFW circuit mile days).

**Recommendation:**

- **Recommended Change 10a:** Clarify Table 10 to use publicly available methodologies for calculating weather variables such as Red-Flag-Warning days to make weather data comparable across utilities.

**Table 11 a & b: Key Drivers of Ignition metrics**

**Issue:** Duplicative with Tables 2 and 18.

**Recommendations:**

- **Recommended Change 11a:** Change to “rate of ignition” from “probability of ignition”.
- **Recommended Change 11b:** Combine with 18 into a single table.

**\*Table 12: Recent Use of PSPS –**

**Issue:** Utilities defined PSPS events differently, making cross-comparison difficult.

**Recommendations:**

- **Recommended Change 12a:** Ensure utilities all define “event” the same way (see SDG&E initial filing and revised)<sup>5</sup>
- **Recommended change 12b:** Move to PSPS section

**Table 15: Fault Locators –**

**Issue:** This is a lagging technology that is being replaced by better sensors.

**Recommendation:**

- **Recommended Change 15a:** Eliminate in WMP.

**Table 18: Drivers of Ignition 5-year Avg –**

**Issue:** Although important, this is merely a summary of data provided in Table 11a & b.

**Recommendation:**

- **Recommended Change 18a:** Combine with Table 11a & b; change to “rate of ignitions” as unit.

## **G. Section 7: Mitigations**

**Issue:** Some columns in table not used in mitigation Tables (21-30).

**Recommendation:**

- **Recommended Change S7a:** In most tables, the column “Line Miles to Be Treated” is not relevant and could be eliminated. Column “Spend per treated line mile” will be kept.
- **Recommended Change S7b:** In most tables the “Other Risk Drivers Addressed” was not relevant and could be eliminated.

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<sup>5</sup> Number of instances where utility operating protocol requires de-energization of a circuit or portion thereof to reduce ignition probability, per year. Calculated through a count of unique PSPS outages (switch plans) per year

## H. NEW Public Safety Power Shutoff Section 8, including Directional Vision

A proposed structural change is creation of a separate section for Public Safety Power Shutoff data and information as the last chapter of the WMP.

Data for this section would be in tables that previously appeared in the Outcome Metrics Table 2.3 and 2.10, in Table 12, of the WMP and in several tables that were part of the Supplemental Data Request (SDR):

- Table 2a Percent of Customers impacted by PSPS
- Table 5b Number and impact of PSPS
- Table 11 PSPS Events
- Table 12 Ignitions avoided by PSPS
- Table 13 a-c Frequency, Scope and Duration of PSPS

In addition to the above, new metrics should be added regarding community outreach of PSPS. The following metrics should be reported quarterly at the bottom of the PSPS metrics section if not reported earlier in the tables above –

- a. # of customers impacted by PSPS (if multiple PSPS events impact the same customer, count each event as a separate customer)
- b. # of medical baseline customers impacted by PSPS (same counting method as a)
- c. # of customers notified prior to initiation of PSPS event (if customer notified for multiple PSPS events, count each event as a separate customer contact. Only count a customer once per event if contacted multiple times regarding the same PSPS event)
- d. # of medical baseline customers notified prior to initiation of PSPS event (same counting method as c)
- e. % of customers notified prior to a PSPS event impacting them
- f. % of medical baseline customers notified prior to a PSPS event impacting them

## I. NEW CPUC Directive:

In addition, a recent Commission decision in the PSPS rulemaking (D.20-05-051) ordered:

- “Beginning in 2021, each electric investor-owned utility Wildfire Mitigation Plan shall include specific short, medium, and long-term actions the utility will take to reduce the impact of and need for de-energization events to mitigate wildfire risk.”
- **Recommendation for Directive:** Move existing section 4.4 from 2020 WMP Guidelines to PSPS section, keep instructions as is for narrative and table, but require narrative be organized under subheadings for short (1 year), medium (3 years), and long-term (10 years) plans.

## **J. New WMP Directive: Citing relevant statutes and orders in narrative and initiatives**

**Issue:** In previous WMP reports, references to relevant statutes, orders, and proceedings were missing or placed in disparate locations.

### **Recommendation:**

- **Recommended change 1:** Throughout WMP, relevant state and federal statutes, orders, and proceedings should be cited where relevant (title of statute in parentheses next to comment, or placed in relevant area in table), with a brief description or summary of the relevant portion of the statute provided in the appendix.