



SAFETY AND ENFORCEMENT DIVISION  
**MONTHLY PERFORMANCE REPORT**

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June 2022



California Public  
Utilities Commission

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This Report reflects Safety and Enforcement Division’s monthly work product. It has not been approved by the Commission rather it is information provided by the Division.

## INTRODUCTION

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The CPUC's Safety and Enforcement Division (SED) oversees the safety of electric and communication facilities, natural gas infrastructure and propane facilities. SED is comprised of three branches of utility engineers, analysts and investigators that focus on ensuring the safety of utility infrastructure and reducing utility caused wildfires. SED advocates for public safety through performing safety audits, conducting incident investigations, and appearing in CPUC safety proceedings. SED has the authority to issue citations with penalties against utility operators who violate public utility safety codes and requirements.

## GAS SAFETY AND RELIABILITY BRANCH (GSRB)

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The Gas Safety and Reliability Branch (GSRB) ensures that intra-state natural gas and liquid petroleum gas (LPG) pipeline systems are designed, constructed, operated, and maintained according to safety standards set by the CPUC and the federal government. CPUC gas safety engineers are trained and qualified by the federal government. The CPUC enforces natural gas and LPG safety regulations; inspects construction, operation, and maintenance activities; and makes necessary amendments to regulations. Its mission is to protect and promote the safety of the public and utility employees that work on the gas pipeline systems. June activities with external stakeholders included:

- A. Meeting with the Pipeline and Hazardous Materials Safety Administration (PHMSA) regarding Inspector Assistant (IA) state specific content
- B. Leadership meeting with PG&E

SED has the authority to issue citations with penalties for operator violations of public utility safety codes and requirements<sup>1</sup>. The citation process allows the CPUC to act expediently in matters where violations of state and federal rules are clear and unambiguous. Citations may arise out of an ongoing investigation into related matters when a violation is brought to the CPUC's attention directly. The table below shows the status of pending citations issued by SED. The citations can be found on the CPUC's website [here](#).

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<sup>1</sup> In December 2011, the CPUC created a citation process authorizing staff to impose fines for natural gas violations.

Citation Number	Utility	Amount	Violations per GO 112-F	Date Cited	Description	Status
G-20-08-001	Glenview Mobile Lodge	\$50,000	192.605(a), 192.605(b)(3), 192.616(j), 192.723(b)(2), 192.747(a), 192.805, 192.1015(a), 192.357(a), 192.479(a), & 192.353(a)	8/24/20	The MHP failed to remediate violations discovered during an inspection	Alternative Dispute Resolution (ADR) conducted on 12/22/21. Operator paid settled amount on 6/22/22. <b>Closed.</b>
G.22-06-001	PG&E	\$1,270,000	192.465(d)	6/24/22	127 Cathodic Protection (CP) Areas and Assets that exceed 24 months (15 plus 9 months) of remedial action to the date the CP was found below adequate levels of protection.	Pending.

### Natural Gas Inspections (Year to Date)

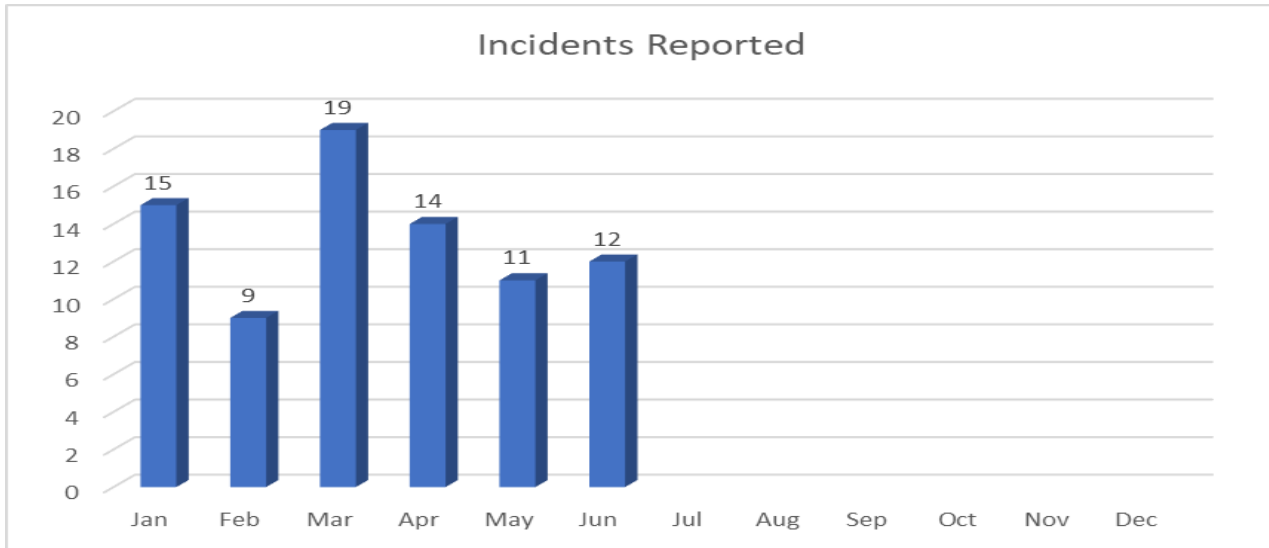
The purpose of GSRB’s inspections is to confirm that operators continue to construct, operate, and maintain their pipeline facilities in a manner that ensures the safety of workers and the public. In addition to routine inspections, GSRB also conducts on-site construction inspections. Typically, each inspection consists of records review of an operator’s past compliance activities, and field verifications. Results are documented in a final report and sent to the operator after the inspection. The expectation is to have a final report sent to the operator within 60 days of the inspection. GSRB will submit an Inspection Closure Letter to the operator within 120 days from the day the inspection is completed. The table below shows GSRB’s inspection activity year-to-date in 2022.

Inspections	Year to June 2022
Conducted	31
Final Report Completed	13

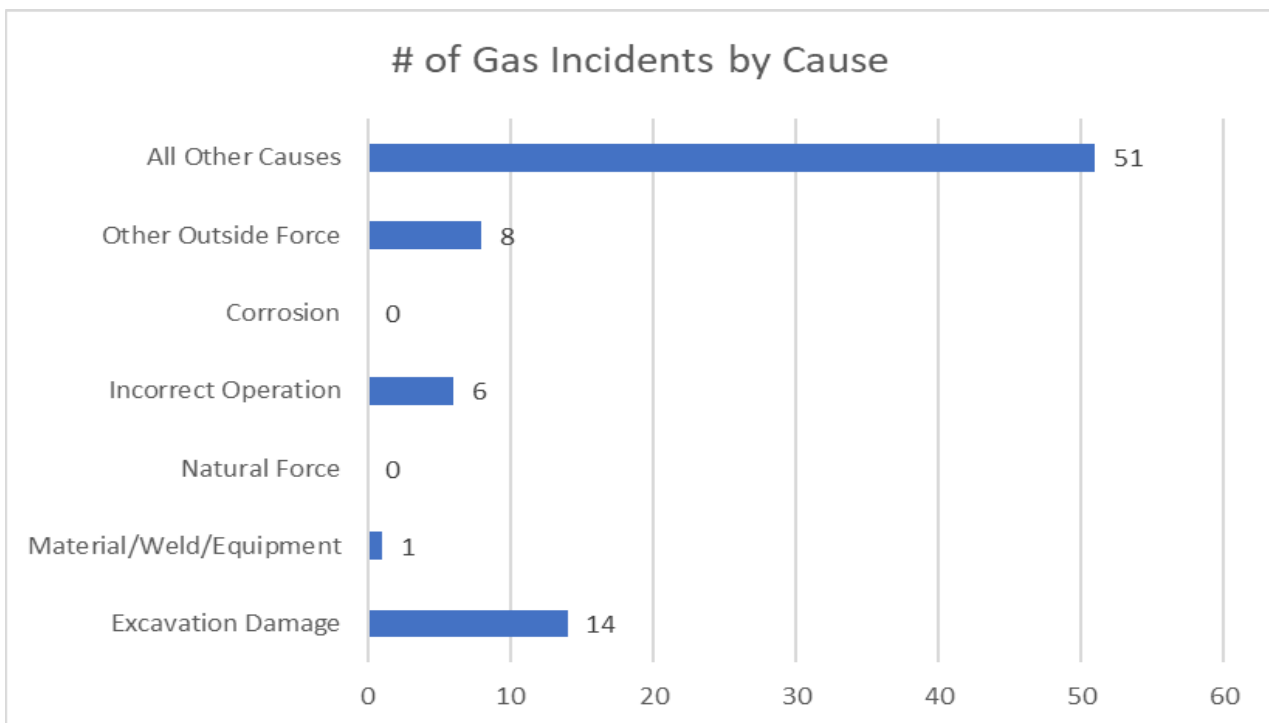


## Natural Gas Incident Reports and Investigations in June 2022

As of June 30, 2022, GSRB Staff received reports of 80 incidents in 2022. All reported incidents are assigned to GSRB engineers to investigate and prepare a final report. The report indicates if there were any violations of GO 112-F by the operators. Operators report incidents based on criteria outlined in GO 112-F.



The bar chart below shows the 80 incidents by cause as of June 30, 2022.



The table below shows the 80 incidents by incident level and status.

Status	Level 1	Level 2	Level 3	Level 4	TOTAL
Open	5	6	3	2	16
Closed	50	13	1	0	64
TOTAL	55	19	4	2	80

The table below provides a description of the four incident levels and provides the timeframes/guidelines for incident reports to be completed and closed from the date of assignment of an investigation.

Levels	Definition of Incident Levels	Guidelines
1	Did not result in injury, fatality, fire or explosion; may be due to an unrelated event outside of the Operator’s control.	60 days
2	Did not result in injury, fatality, fire or explosion; may or may not have caused a release of gas, have been reported due to Operator judgment.	120 days
3	Resulted in a release of gas but did not result in injury, fatality, fire or explosion.	150 days
4	Resulted in injury, fatality, fire or explosion caused by release of natural gas from the Operator’s facilities.	≥ 180 days

### Natural Gas Utility Self-Identified Violation (SIV) Investigations

There were no Self-Identified Violations reported to GSRB in June 2022.

### Customer Safety Complaints

GSRB received and investigated three (3) new customer complaints in June.

One (1) complaint was closed without further action after GSRB addressed the case.

The remaining two (2) complaints are being investigated and listed as: whistleblower allegations concerning IOU overbuilds, and a customer complaint regarding gas service.

## Inspection Notices / Notice of Probable Violation Letters (NOPV)

SED may issue an NOPV based on an investigation, customer complaint, or inspection for a violation of an applicable law or regulation. In June, GSRB issued 4 inspection notices and 0 NOPV letters.

- June 24 – SoCal Gas Transmission Gas Producer Sites inspection letter – 0 probable violations found.
- June 24 – SDG&E Transmission Gas Producer Sites inspection letter – 0 probable violations found.
- June 28 – SCE Section 114 Verification inspection letter – 0 probable violations found.
- June 30 – Southwest Gas High Consequence Area, Moderate Consequence Area, and Section 114 Verification inspection letter – 0 probable violations found.

## Natural Gas Safety and Reliability: Proceedings

### **Aliso Canyon (I.19-06-016) (Commissioner Rechtschaffen /ALJs Hecht / Poirier) (SED Advocacy):**

Please find proceeding highlights from June 2022 below:

- June 3, 2022, Cal Advocates requested that official notice be taken of exhibits CalPA-418, CalPA-462, CalPA-478, and CalPA-479 or in the alternative, admit them into the record of the proceeding.
- June 3, 10, 17, and 24, 2022, Safety and Enforcement Division (SED) filed weekly progress updates reports on each of these dates in compliance with the Administrative Law Judges' March 15, 2022 Ruling. SED reported in each of these filings it had completed review of all emails received from the Commission and found no documents that were responsive to the ALJs' Ruling Requiring an Expanded Document Search, dated February 2, 2022, or the ALJs' Ruling Addressing Two Motions to Compel, dated November 29, 2021. The reports also noted that, "Pursuant to the information provided in General Counsel's March 22, 2022 e-mail, no further searches have been conducted."
- June 16, 2022, Southern California Gas Company (SoCalGas) filed a motion to strike portions of Safety and Enforcement Division's and Public Advocates Office's Opening and Reply Briefs. SoCalGas alleged SED's and Cal Advocates' briefs violated the procedure set out in the Scoping Memo of the proceeding, and further moved to strike portions of SED's reply brief, alleging certain portions were verifiably false and misleading and/or irrelevant.
- June 20, 2022, SoCalGas filed a response to Public Advocates Office's motion for official notice of officially noticeable information. SoCalGas's response requesting that Cal Advocates' motion be denied, alleging Cal Advocates' motion:
  1. Seeks admission of exhibits that the ALJs have already excluded from record;
  2. Seeks admission of exhibits that are not officially noticeable; and
  3. Seeks admission of exhibits that are not material to any disputed issue within the proceeding.
- June 26, 2022, Cal Advocates requested permission to submit a succinct reply to address SoCalGas' June 20, 2022 Response to Cal Advocates' June 3, 2022, motion for official notice of officially noticeable information. Cal Advocates stated its reply would be filed no later than June 30, 2022. On June 27, 2022, the ALJs granted Cal Advocates' request, allowing the reply to be filed within 10 days of SoCalGas' response.

- On June 30, 2022, Cal Advocates replied to SoCalGas’ response opposing Cal Advocates’ June 3, 2022 Motion of official notice of officially noticeable information. Cal Advocates’s reply stated its June 3 motion correctly offered all four exhibits for official notice but withdrew its request for official notice of CalPA-462 to limit unnecessary discourse.

**Mobile Home Parks (MHP) Utility Conversion Program (D.20-04-004) (Commissioner Rechtschaffen /ALJ Hecht) (SED Advocacy):** On April 24, 2020, the Commission issued Decision 20-04-004 which established the Mobile Home Park Utility Conversion Program (MHP-UCP) which authorizes IOUs to install new gas and electric utility systems in mobile home parks to replace master-metered utility systems. The program goal is to convert 50% of all mobile home spaces by the end of 2030 according to a risk-based priority ranking system developed by GSRB. GSRB received forms of intent from 986 mobile home communities before the deadline on March 31, 2021. SED created a risk-prioritization list which included new applicants, and parks still on the Pilot list from 2015, and ranked them according to their utility system’s risk of failure. SED has delivered the priority list to all participating investor-owned utilities, and the utilities are currently working with MHP Owners to plan and execute conversion projects. There are currently 586 “Category 1” parks, which have a total of 37,890 spaces. SED estimates the utilities will start the conversion process with these Category 1 Parks sometime before the second priority list is produced in July 2025.

In March 2022, the Utility companies filed their required MHP-UCP Annual Reports, which tracks (among other things) the numbers of MHP spaces converted to direct service to gas and electric, both to the meter (TTM) and beyond the meter (BTM), and the cost of those conversions.

Utility	Electric Spaces Converted (TTM)	Electric Spaces Converted (BTM)	Gas Spaces Converted (TTM)	Gas Spaces Converted (BTM)	Total Cost
Bear Valley Electric	0	0	n/a	n/a	\$0
Liberty Electric	0	0	n/a	n/a	\$0
PacifiCorp	0	0	n/a	n/a	\$0
PG&E	897	809	897	809	\$27,757,049.60
SCE	1,274	1,264	n/a	n/a	\$19,337,399
SoCal Gas	n/a	n/a	2,011	1,560	\$20,180,138
SDG&E	2,848	2,750	3,010	2,874	\$79,909,089
SWG	n/a	n/a	58	56	\$506,361

The full reports can be found on the MHP-UCP webpage: <https://www.cpuc.ca.gov/regulatory-services/safety/mhp/mobilehome-park-utility-upgrade-program>



**PG&E Locate and Mark Practices OII (I.18-12-007) (Commissioner Rechtschaffen/ALJ Allen) (SED Advocacy):** On February 20, 2020, the Commission issued Decision 20-02-036 which ordered several shareholder-funded gas and electric System Enhancement Initiatives. On August 21, 2020, SED selected a consultant for the Compliance and Ethics Corrective Action Program Audit. On October 15, 2020, SED selected a consultant for the Locate and Mark Compliance Audit and the Locate and Mark Field Audit. On November 17, 2020, PG&E submitted its proposed methodologies for SED’s review and approval. On January 12, 2021, SED responded to PG&E’s proposed methodologies review request. On February 4, 2021, PG&E informed SED about a request from its 3rd Party consultant for the Locate and Mark Field Audit to solicit input from another external party (Exponent) to further develop its sampling methodology. SED responded on February 4, 2021. PG&E submitted its first Locate and Mark Annual Report in accordance with Commission Decision (D.) 20-02-036 on April 26, 2021.

On June 4, 2021, the Locate and Mark Field Audit consultant submitted their methodology and SED approved this proposed methodology on July 13, 2021. The Locate and Mark Field Audit consultant has performed a pilot Locate and Mark Field Audit and implemented some improvements to the program that are described in a letter submitted to SED on August 25, 2021. On September 16, 2021, the Locate and Mark Field Audit consultant provided SED with the format of the Semi-Annual Report for the compliance audit using field reviews of a random sampling of gas and electric Locate and Mark tickets. On October 15, 2021, PG&E shared with SED its Enhanced Review of Cultural Survey Results, and the Compliance and Ethics Corrective Action Program Audit consultant also provided their audit reports to SED and PG&E. On December 20, 2021, PG&E met with SED to inform it of the status of the Locate and Mark OII Settlement implementation plan. On January 13, 2022, PG&E provided its response to the reports issued by the independent consultant on the results of their review of PG&E’s Corrective Action Program (CAP) and Compliance and Ethics Helpline Program. According to its response, PG&E plans to implement all nine CAP-related recommendations in by 2023 and all Helpline-related recommendations. On January 19, 2022, the Locate and Mark Field Audit consultant notified SED that they have implemented some additional improvements to the program. On February 17, 2022, the Locate and Mark Field Audit consultant submitted the Semi-Annual Report. On April 25, 2022, PG&E submitted its Locate and Mark Annual Report. The reporting period for this Annual Locate and Mark Report is January 1, 2021 through December 31, 2021. On June 30, 2022, PG&E provided an update to SED on the timing of PG&E’s planned completion of the Helpline-related recommendations.

## ELECTRIC SAFETY AND RELIABILITY BRANCH (ESRB)

The mission of ESRB is to enforce state statutes and regulations regarding the safety and reliability of electric facilities, communication facilities, and power plants that are within the jurisdiction of this Commission in California, to ensure that the facilities are operated and maintained in a safe and reliable manner to protect and promote the public health and safety, and to facilitate an environment inside and outside of the Commission that increases the safety and reliability of these facilities. June 2022 activities are below and include:

- Conducted 2 Communication Infrastructure Provider (CIP) audits, 5 Electric Distribution audits, 2 Substation audits, and 3 Power Plant audits.
- Issued 1 Electric Distribution audit report, 1 Substation audit report, and 1 Power audit report.
- ESRB reviews daily outage reports from power plants. Outages could be forced or planned. ESRB reviews the status and cause of each outage, may issue data requests related to the status and cause of each outage, and will follow up with power plants regarding the outage as necessary. In June 2022, ESRB monitored the status of 11 planned outages and 74 forced outages reported by natural gas and renewable energy power plants.

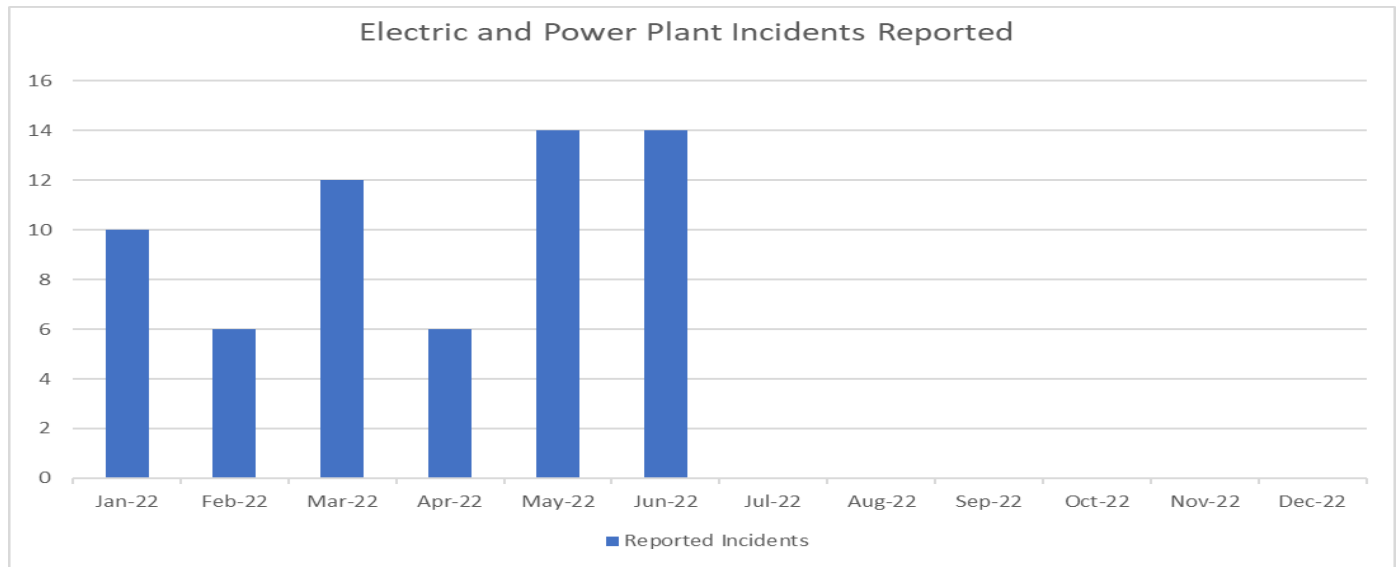
### Electric Facilities Citations

SED has the authority to issue citations with penalties for electric utilities and Communication Infrastructure Providers (CIPs) for violating Commission General Orders and Public Utility Code (PU Code) rules. Citations may arise from violations discovered during incident investigations, audits, customer complaint investigations, whistleblower investigations, or other safety matters that are brought to the attention of SED. The table below shows the status of citations issued by SED in 2020 and 2021. All SED citations related to electric and communication facilities can be found on the Commission’s website [here](#).

Citation Number	Utility	Amount	Violations	Date Cited	Description	Status
D.16-09-055E.20-12-001	SCE	\$1,000,000	GO 128, Rules 17.1 and 17.7., and PU Code, Section 451	12/4/2020	Failure to properly mark the location of SCE’s underground facilities which resulted in one injury	Paid in January 2021
D.16-09-055 E.21-11-001	PG&E	\$5,000,000	Public Utilities Code (PU Code), Section (§) 451, and General Order (GO) 95, Rules 18, 31.1, and 31.2	11/22/2021	Inadequate inspections of the Ignacio-Alto Sausalito transmission lines	Paid in December 2021
D.16-09-055 E.21-11-002	PG&E	\$2,500,000	General Order (GO) 165, III. Distribution Facilities B. Standards for Inspection	11/22/2021	Incomplete detailed inspection of distribution poles	Paid in December 2021

## Electric and Power Plant Incidents Reported in June 2022

ESRB received 13 electric incident reports and 1 power plant incident report in June 2022.



## Electric Facilities and Power Plant/Generation Incident Investigations

Incident status		Level 1	Level 2	Level 3	Level 4	Total <sup>2</sup>
Total open incidents	Electric Facilities	6	14	62	53	135
	Generation	2	1	3	1	7
Total incidents reported in 2022	Electric Facilities	4	6	36	14	60
	Generation	1	0	1	0	2
Total incidents closed in 2022	Electric Facilities	3	8	33	21	65
	Generation	1	0	5	1	7
Total open 2022 incidents	Electric Facilities	2	6	32	13	53
	Generation	1	0	1	0	2
Incidents reported in June 2022	Electric Facilities	1	4	7	1	13
	Generation	1	0	0	0	1
Incidents closed in June 2022	Electric Facilities	0	1	6	3	10
	Generation	0	0	2	0	2

<sup>2</sup> Level 1: A safety incident that does not 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).

The above table shows information about ESRB incident investigations as of June 30, 2022, and incidents reported and closed in June 2022. The level designation indicates increasing severity, with Level 4 as the most severe. See footnote 2 for definitions of each level. The guidelines to close incident reports are similar to those GSRB follows (see Guidelines table in the GSRB section).

## Customer Safety Complaints

ESRB investigated 29 electric and communication safety and reliability customer complaints in June 2022.

## Notice of Violation Letters

ESRB did not issue Notice of Violation (NOV) letters in June 2022. ESRB may issue an NOV in response to an investigation or customer complaint for a violation of an applicable law or regulation.

## Electric Safety and Reliability: Proceedings

**PG&E Locate and Mark Practices OII (I.18-12-007) (Commissioner Rechtschaffen/ALJ Allen) (SED Advocacy):** D. 20-02-036 approved several shareholder-funded gas and electric System Enhancement Initiatives but with a longer compliance audit period of four years and a \$110 million total penalty. In November 2020, ESRB staff reviewed PG&E's One Call Concepts Timely Ticket Review Methodology and PG&E's Field Review Methodology and provided comments to GSRB for consideration. On June 4, 2021, ICQ Professionals, LLC, submitted "Proposed Objectives, Methodology and Final Report Description for SED Consultation of Field Audits for Locate and Mark OII I.18-12-007 Settlement". This submittal starts the process of consulting with the CPUC/SED on the objectives, methodology, and the final product description of the Field Audit of PG&E's Locate and Mark Program by ICQ Professionals, LLC. The primary focus is to provide the sampling methodology that will be used to conduct this audit. In September, ESRB reviewed ICQ Professionals, LLC's field audit report. In January 2022, ICQ Professionals, LLC, revised and improved its field audit methodology for PG&E's Locate and Mark Program. No significant updates in June 2022. Pending.

**SCE Appeal of Twentynine Palms Citation (K.18-03-008) (ALJ Kim) (SED Advocacy):** ESRB investigated an incident that occurred on August 1, 2015, in Twentynine Palms. 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. The amended citation was the result of new violations. Hearings were held in December 2018, February 2019, and March 2019. Briefs and reply briefs were filed in April 2019. Awaiting a draft Resolution on the Twentynine Palms incident. 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) (SED Advocacy):** In 2017, the Commission opened a proceeding to address the feasibility of establishing a data management platform for pole owners and tenants to access pole data, attachment and conduit data. This

investigation is being conducted in three tracks. In the current phase of the proceeding, parties addressed requirements for pole attachments via comments and are awaiting a proposed decision. On December 15, 2020, the Assigned Commissioner's Office issued a Second Amended Scoping Memo and Ruling that outlined next steps in the consolidated Pole OII/OIR proceeding. On March 9, 2021, the ALJ issued a Ruling that requested parties to file comments by April 12, 2021, on a One-Touch-Make-Ready (OTMR) proposal.

On June 15, 2022, the Commission issued an Amended Scoping Memo and Ruling to address Track 3 issues, which relate to conduit data. Such issues will be identified by a subsequent ruling from either the Assigned Commissioner or the assigned Administrative Law Judge. The ruling also set a procedural schedule for the One-Touch-Make-Ready Decision, the Conduit Data Ruling, and the Conduit Data Decision. Pending.

**Physical Security of the Electric System and Disaster and Emergency Preparedness (R.15-06-009) (Commissioner Rechtschaffen/ALJ Kelly) (SED Advocacy):** On May 22, 2015, the Commission issued an OIR regarding policies and regulation of physical security for electric supply facilities and to establish standards for disaster and emergency preparedness plans. This rulemaking was conducted in two phases. Phase I addressed physical security for electric supply systems and was resolved by Decision (D).19-01-018. Phase II addresses disaster and emergency preparedness plans for electrical corporations and regulated water companies.

On July 1, 2020, the Safety Policy Division (SPD) submitted a letter dated June 26, 2020, from the Deputy Executive Director of SED and SPD to enact the Interim Trial Procedures (ITP) to allow Commission staff to receive major utility compliance deliverables. On July 10, 2020, the six IOUs submitted their Preliminary Assessments under the ITP process to SPD and subsequently presented their briefings regarding their Preliminary Assessment submissions to SPD and SED staff. Three IOUs submitted supplemental filings and met with SED and SPD to discuss their filings.

On November 19, 2020, the Commission issued D. 20-11-048 which extended the statutory deadline for Phase II to May 30, 2021. On May 21, 2021, the Commission issued D. 21-05-019 which updates electric utilities' emergency plans under General Order (GO) 166 and for water utilities, under GO 103-A. Decision 21-05-019 incorporates requirements from PU Code 768.6 in Standard 14 of GO 166. The IOUs' Final Security Plans and the Publicly Owned Utilities' (POU) Notice of Final Plan Adoption were due July 2021, 30 months after the adoption of D. 19-01-018. The Security Plans and Notices would be submitted to SPD. The most recent decision, D. 21-05-019, left the proceeding open to address the Petition for Modification that was filed concerning D. 19-01-018 (Phase I Decision) in this proceeding.

Furthermore, D.21-05-019 changed the annual deadline for electric utilities' GO 166 annual reports to April 30, 2022. The IOUs submitted their annual reports to SPD for their review. In May 2022, each IOU briefed SPD on their GO 166 annual reports and emergency plans. Pending

## Other ESRB Activities

- **Citations:** ESRB issued no citations in June 2022.

**Compliance with Decision 20-05-019 regarding PG&E's 2017 and 2018 Wildfires (I.19-06-015):** On May 8, 2020, Decision (D.) 20-05-019 was issued approving a Settlement Agreement, with modifications, between



SED, PG&E, Coalition of California Utility Employees (CUE), and the Office of Safety Advocates (OSA). On December 4, 2020, a Final Decision (D.20-12-015) was issued modifying D. 20-05-019 and denying rehearing of D. 20-05-019. The Decision imposes penalties on PG&E totaling \$2.137 billion consisting of \$1.823 billion in disallowances for wildfire-related expenditures, \$114 million in shareholder-funded System Enhancement Initiatives, and a \$200 million fine payable to the General Fund (the fine to be suspended). ESRB is monitoring PG&E's work to ensure compliance with the Settlement Agreement and D. 20-05-019. On February 12, 2021, and consistent with D. 20-05-019, PG&E filed its first semi-annual report which provided updates and an overview of PG&E's progress on each of the 20 corrective actions in the Settlement Agreement.

The Settlement Agreement requires PG&E to implement Safety Enhancement Initiatives (SEI). PG&E hired contractor David Mason + Associates (DMA) to conduct the independent audits under the SEI #14 which addresses Wildfire Safety audits. In May 2022, ESRB and SPD provided edits and comments on the Phase 1 T&D audit report written by David Mason and Associates (DMA), a third-party consultant. DMA provided feedback on ESRB and SPD comments and will meet with DMA to discuss revision of the Phase 1 T&D audit report. Additionally, DMA has initiated field audits of PG&E T&D infrastructure and has provided reports on field visits to the Mission and Kern/Midway Divisions. DMA is continuing to work on completing the next revision of the Phase 1 Audit Report which is tentatively due on July 1st. The report will be sent to PG&E, SED, and SPD for review and a meeting will be scheduled to discuss its contents.

In June 2022, SED met separately with PG&E and Grant Thornton (GT), a third-party consultant hired to conduct the audits, to discuss the scope of work for audits of PG&E's compliance with SEI 3 (Funding for Foundation for Independent Living), SEI 4 (GO 165 Review), SEI 6 (LiDAR Asset Analysis), SEI 8 (Fuel Reduction Spending), and SEI 10 (Vegetation Management). Pending.

**Compliance with D. 17-09-024 regarding Long Beach Incident:** Decision 17-09-024 adopted a Settlement Agreement between SCE and SED. Under the Agreement, 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 California Independent System Operator (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 meetings.

## **WILDFIRE SAFETY AND ENFORCEMENT BRANCH (WSEB)**

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SED's WSEB is dedicated to the enforcement of public utility wildfire safety and Public Safety Power Shutoff (PSPS) violations. WSEB is the lead investigator for utility incidents relating to wildfire, PSPS events and other aspects related to wildfire events. The staff conducts incident investigations and provides input into policy development.

June 2022 activities for WSEB include:

- Currently investigating thirteen (13) utility-related wildfires. One fire investigation was initiated in June 2022. One fire investigation was completed in June 2022.
- One (1) PSPS event in June 2022: SCE June 17, 2022 PPS event.
- Participated in:
  - PG&E’s 2022 Q2 Regional Working Groups.
  - PG&E, SDG&E, Bear Valley, and Liberty PPS Exercises.
- Continued monitoring and coordinating SCE’s 2020 PPS Corrective Action Plan implementation.

### PSPS Activations, De-energizations & Post Event Reports - June 2022

WSEB	PG&E	SCE	SDG&E	Bear Valley	Pacific Corp	Liberty
Total PPS Activations	0	1	0	0	0	0
Total PPS w/ De-energization	0	0	0	0	0	0
Total PPS Post Event Reports Reviewed	0	1	0	0	0	0

### PSPS Related Proceedings

#### **Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions (R.18-12-005) (President Batjer/ALJ Poirier /ALJ Stevens/ALJ Kao/ALJ DeAngelis) (SED Advisory):**

This OIR was opened to further examine policies and guidelines adopted in ESRB-8 regarding communication, notification, mitigation and other logistic and implementation issues of a PPS event. Currently, there are two tracks in this OIR:

1. Continued examination of utility de-energization/PPS practices and guidelines.
2. An Order to Show Cause (OSC) for why PG&E should not be sanctioned for violations of P.U. Code 451, D.19-05-042 (Phase I) and ESRB-8 concerning three PPS events in Fall 2019. Briefs were filed in 2020 and the Presiding Officer’s Decision (POD) was issued on May 26, 2021.

The POD penalizes PG&E \$106.003 million for its flawed implementation of the Fall 2019 PPS events, offset by bill credits PG&E has already provided to customers. The penalty includes a PG&E shareholder contribution of \$1.418 million to provide qualifying customers access to backup portable batteries, a bill credit to the general group of customers in the areas affected by the Fall 2019 PPS

events and to the Medical Baseline customers in those affected areas. PG&E and California Large Energy Consumer Association (CLECA) filed appeals of the POD on June 25, 2021; both were denied.

3. On February 19, 2021, the ALJ issued a Phase 3 Scoping Memo and Ruling to consider whether existing de-energization guidelines (Phase 2) should be further updated, or if new guidelines should be adopted in advance of the 2021 wildfire season. Comments and reply comments were submitted in March 2021.

On June 24, 2021, the Commission approved and adopted the Proposed Decision's Phase 3 PSPS Guidelines (D.21-06-034). A link to the Phase 3 Guidelines is [here](#).

4. On September 23, 2021, the Commission adopted D.21-09-026 (the Modified Presiding Officer's Decision) that found violations including failure of PG&E's website, which was unavailable or non-functional during significant portions of the PSPS event; inaccurate online outage maps; inaccessible secure data transfer portals to its public safety partners; and failure to provide advanced notification of de-energization events to approximately 50,000 customers and 1,100 Medical Baseline customers during the three PSPS events in Fall 2019.

The Commission penalized PG&E \$106.003 million to deter future violations and demanded accountability for PG&E's flawed implementation of the Fall 2019 PSPS events. The penalty will be offset by \$86 million for bill credits PG&E has already provided to some electric customers in 2019. The net penalty assessed on PG&E is \$20.003 million.

The penalty also includes a PG&E shareholder contribution of \$1.418 million to PG&E's Disability Disaster Access & Resources Program, which provides qualifying customers access to backup portable batteries through grant, lease-to-own, or low-interest loan options; a PG&E shareholder-funded bill credit of \$12.185 million extended to all electric customers in the geographic areas affected by the Fall 2019 PSPS events; and a PG&E shareholder-funded bill credit of \$6.4 million to the Medical Baseline customers in the geographic areas affected by the Fall 2019 PSPS events.

5. On April 29, 2022, in compliance with D.21-06-034, SED issued the approved template for the IOUs' annual PSPS Pre-Season reports. The first annual PSPS Pre-Season reports are due July 1, 2022.

**PSPS Order Instituting Investigation (I.19-11-013) (Commissioner Batjer/ALJ DeAngelis) (SED Advisory).** This Investigation was initiated to determine whether the IOUs that experienced PSPS events in late 2019 prioritized safety and complied with the Commission's regulations and requirements in ESRB-8 and Decision (D).19-05-042 (Phase 1 PSPS Guidelines). A Proposed Decision was issued for public comment on April 20, 2021, with comments due May 10, 2021. On June 7, 2021, D.21-06-014 was approved by the Commission. On July 7, 2021, the Acton Town Council filed a Rehearing Request which reopened this proceeding.

In compliance with Ordering Paragraph 61 of D.21-06-014 of this Investigation, and D.19-05-042 in Rulemaking 18-12-005, SED prepared and sent out a draft template on July 7, 2021, for use by electric investor-

owned utilities when submitting post-event reports and lessons learned following a Public Safety Power Shutoff (PSPS). Comments were due August 6, 2021. Staff completed comment review in September and revised the draft template based on comments. The final approved template was issued on October 18, 2021.

The IOUs used the approved template to submit their 2021 Post-Event Reports to the CPUC which are posted on the CPUC website at <https://www.cpuc.ca.gov/consumer-support/psps/utility-company-psps-reports-post-event-and-post-season>.

## **Monitoring the Whistleblower Website and Safety Hotline**

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The Commission regulates privately owned utilities. It serves the public interest by protecting consumers and ensuring that utility services and infrastructure are safe, reliable, and available at reasonable rates. It is charged with ensuring that these regulated service providers comply with the regulations. Whistleblower complaints can result in investigations that may involve safety and other issues. In June 2022, one (1) whistleblower complaint was submitted online to SED.

SED received three (3) inquiries from the Safety Hotline inbox.