PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Wildfire Safety Division
Resolution WSD-011
November 19, 2020

R E S O L U T I O N

Resolution WSD-011. Resolution implementing the requirements of Public Utilities Code Sections 8389(d)(1), (2) and (4), related to catastrophic wildfire caused by electrical corporations subject to the Commission's regulatory authority.

SUMMARY:

This Resolution implements the requirements of Public Utilities Code Sections 8389(d)(1), (2) and (4), related to catastrophic wildfire caused by electrical corporations subject to the Commission's regulatory authority.[1] The statute requires the following:

> (d) By December 1, 2020, and annually thereafter, the [C]ommission, after consultation with the [Wildfire Safety [D]ivision], shall adopt and approve all of the following:
>
> (1) Performance metrics for electrical corporations.
>
> (2) Additional requirements for wildfire mitigation plans.
>
> (4) A process for the division to conduct annual safety culture assessments for each electrical corporation.

To implement Sections (d)(1) and (2), this Resolution provides updates to electrical corporations' 2021 Wildfire Mitigation Plan (WMP) requirements, including updates to the metrics, templates, reports and maturity model required of electrical corporations for 2020 WMPs. To implement Section (d)(4), this Resolution provides a recommended process for annual safety culture assessments for each electrical corporation.

Assembly Bill (AB) 1054 (2019) authorizes the Wildfire Safety Division (WSD) to approve or deny electrical corporations' proposed WMPs and the Commission to ratify the WSD's determinations as appropriate. For 2020 the WSD evaluated

[1] All statutory reference are to the Public Utilities Code. Subsection (d)(3) relates to compliance and is addressed in a separate Resolution.

WMPs based on guidance issued on December 16, 2019, in the WMP Rulemaking (R.) 18-10-007. This Resolution refines the guidance based on stakeholder comments about the 2020 guidance, the California Wildfire Safety Advisory Board's (WSAB) June 24, 2020, input,[2] and the WSD's experience with the 2020 WMP review process.

The elements of the revised WMP guidance and annual safety culture assessment process are included as attachments to this Resolution. The Attachments are as follows:

- **Attachment 1: Incorporation of WSAB Recommendations**
  This document contains the WSD's analysis of the WSAB recommendations.
- **Attachment 2.1: Changes to WMP Guidelines**
  The WMP requirements are fundamentally the same as in 2020 but are restructured to streamline reporting and evaluation. This document summarizes the major changes to WMP sections and tables.
- **Attachment 2.2: 2021 WMP Guidelines Template**
  Definitions of metrics have been clarified, and tables have been altered to improve reporting.
- **Attachment 2.3: 2021 Performance Metrics Data Template**
  Provides an Excel spreadsheet for completing quarterly non-spatial data reports.
- **Attachment 2.4: 2021 Maturity Model**
  The Utility Wildfire Mitigation Maturity Model is a method to assess utility wildfire risk reduction capabilities and examine the relative maturity of the wildfire mitigation programs. In the 2021 WMP review, the WSD will assess progress on maturity by comparing the utility's progress from the utility's 2020 maturity survey, WMP and other data sources, subject to audit and verification.

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[2] Recommendations on the 2021 Wildfire Mitigation Plan Guidelines, Performance Metrics, and Safety Culture, June 24, 2020. https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organization/Divisions/WSD/WSAB%20Recommendations%20on%202021%20WMP%20Guidelines%20APPROVED%20CONCURRENCES%206.24.2020.pdf

- **Attachment 3: Changes to WMP Process**
  This document recommends an improved 2021 WMP evaluation schedule, timeline and process.
- **Attachment 4: Annual Safety Culture Assessment Process**
  The WSD's recommendation for annual safety culture assessments pursuant to Public Utilities Code § 8389(d)(4).

PROPOSED OUTCOME:

- Provides revised guidance for utilities to complete their 2021 WMP updates.
- Provides for a phased consideration of WMPs, with Small and Multijurisdictional Utilities' (SMJUs) and Independent Transmission Owners' (ITOs) WMPs due one month after those of the large Investor Owned Utilities (IOUs).
- Considers and incorporates the majority of the WSAB's proposed performance metrics and other recommendations.
- Refines the process for the Commission to evaluate and approve/disapprove 2021 WMP updates.
- Proposes a process for annual safety culture assessments for each electrical corporation.

SAFETY CONSIDERATIONS:

- Mitigation of catastrophic wildfires in California is among the most important safety challenges the Commission-regulated electrical corporations face. WMPs list an electrical corporation's proposed actions to help prevent catastrophic wildfire, so comprehensive WMPs are essential to safety.
- By implementing measures such as vegetation management, system hardening (such as insulating overhead lines and removing or upgrading equipment most likely to cause fire ignition), improved inspection and maintenance, situational awareness (cameras, weather stations, and use of data to predict areas of highest fire threat), improved community engagement and awareness,

and other measures, utility-caused catastrophic wildfire risk should be reduced over time.

- The WMP changes for 2021 should enhance California's ability to review and monitor the electrical corporations' actions in mitigating catastrophic wildfire.
- The process for conducting annual safety culture assessments should help ensure electrical corporations improve their focus on and culture of safety at all levels of their businesses.

ESTIMATED COST:

- This Resolution does not address or approve costs, but instead focuses on WMP requirements and a process for evaluating electrical corporation safety culture.
- WMP costs are to be addressed in electrical corporation General Rate Cases or other applications, not in WMPs or safety culture assessments.

I. BACKGROUND

The Commission opened Rulemaking (R.) 18-10-007 in 2018 to review the 2019 WMPs and approved those WMPs in Commission decisions pursuant to Senate Bill (SB) 901. AB 1054 moved the review of WMPs to the WSD. The legislation also added new provisions in § 8389(d) for the Commission to annually adopt and approve performance metrics for electrical corporations; requirements for wildfire mitigation plans; and a process for the WSD to conduct annual safety culture assessments for each electrical corporation.

The Commission adopted Resolution WSD-001 setting forth the process for review of the 2020 WMPs in light of AB 1054's transfer of responsibility for review of WMPs to WSD. In June 2020, the Commission ratified the WSD's approval of all electrical corporations' WMPs in Resolutions WSD-002 – 009, except Bear Valley Electric Service (BVES).[3]

The 2020 process revealed a need for several refinements for 2021. Utilities were inconsistent in their reporting of projected expenditures associated with their wildfire mitigation efforts. In some cases, few cost estimates were given; in others, there was overlap and duplication across categories. The revised WMP Guidelines (Attachment 2.2) therefore require additional details, cost summaries and estimates of ratepayer impacts. Other changes for 2021 WMPs relate to definitions and units of measurement used in reporting and elimination of duplicate tables or line items in tables that are not necessary for 2021 WMPs.

The revised WMP Guidance includes a "completeness checklist" detailing the 22 statutory requirements of AB 1054 and amended by AB 111. It also includes tables for summarizing the projected costs of mitigations proposed in the WMP, with a column for actual 2020 expenditures, and a table for estimates of the ratepayer impacts of proposed mitigation expenditures.

To consolidate data and analysis related to Public Safety Power Shutoffs (PSPS), the revised WMP Guidance includes a PSPS Section requiring utilities to describe their efforts to minimize, if not eliminate, the use of PSPS as a preferred mitigation option.

[3] BVES resubmitted it's 2020 WMP on September 18, 2020; it is currently under review.

II. STAFF PROPOSALS, WORKSHOP AND COMMENTS

On August 6, 2020, the WSD circulated a "Staff Proposal on Changes to Wildfire Mitigation Plan Requirements and Metrics Tables." The WSD conducted remote workshops on August 12 and 13, 2020, (due to the COVID-19 pandemic) to present to stakeholders and the public proposed revisions to the guidance for 2021 WMPs. The workshops also introduced WSD's approach to collection and naming of data relevant to wildfire mitigation, and the WSAB presented its proposed "System Hardening and Electric Utility Resilience" standard contained in its June 24, 2020 Final Report.

Finally, the workshops reviewed and gave parties the opportunity to comment on "Draft Recommendations for Developing a Safety Culture Assessment Process," which the WSD also circulated on August 6, 2020.

On August 26, 2020, thirteen utilities, stakeholder groups and individuals submitted comments on the staff proposals and workshop.[4] Based on the comments, this Resolution adopts the following refinements to the staff proposals:

- The use of "near miss" events in metrics reporting is revised to "risk events." Risk events are intended to encompass the suite of all event types that may be informative of utility ignition risk. These are defined as 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 cause sparking or have the potential to cause ignition.
- Aspects of the proposed annual safety culture assessment process are revised with respect to safety governance and proposed tools for assessment.

Among comments and suggestions that were incorporated into the final proposals, the following are reflected in the Attachments to this Resolution:

[4] The following stakeholders submitted comments: William Abrams, Public Advocates Office, California Association of Small & Multi-Jurisdictional Utilities, CTIA, Coalition of California Utility Employees, Green Power Institute, Mussey Grade Road Alliance, Protect Our Communities Foundation, Pacific Gas and Electric, Rural County Representatives of California, San Diego Gas & Electric, Southern California Edison, and The Utility Reform Network (TURN).

- The IOUs and Mussey Grade Road Alliance questioned the value of near miss reporting as defined. This Resolution uses the term "risk events" to ensure consistency with data currently collected, as noted above.
- The IOUs and TURN raised concerns about the proposed schedule for WMP filing and evaluation. This Resolution adopts a "phased" approach to afford the WSD and parties additional time to review WMPs.
- The IOUs and TURN questioned the use of outcome metrics to measure safety culture. While outcome metrics will continue to be used, the assessment process will also identify "indicators of culture."
- TURN warned against the potential for utility manipulation of the information provided in self-assessments of safety culture. These concerns will be balanced by use of a WSD wildfire workforce survey and in-person interviews with targeted utility staff.

III. <u>DISCUSSION</u>

1. Attachment 1: Incorporation of WSAB Recommendations

Section 8389(b) directs the WSAB to make recommendations to the WSD by June 30, 2020 and annually thereafter on:

- Appropriate performance metrics and processes for determining each electrical corporation's compliance with its approved WMP;
- Appropriate requirements in addition to the requirements set forth in § 8386 for the WMP;
- The appropriate scope and process for assessing the safety culture of an electrical corporation.

The WSAB approved its recommendations on the 2021 WMP guidelines, performance metrics and safety culture on June 24, 2020, and submitted a final report to the WSD on June 26, 2020. Section 8389(c) requires the WSD to analyze the WSAB's input for Commission consideration.

The WSD's analysis appears in Attachment 1 to this Resolution. In summary, the WSD fully incorporated six recommendations, incorporated nine with modification, and declined to incorporate four recommendations. Those recommendations are as follows:

Table 1.1 Summary of WSAB WMP Recommendations

Fully Incorporate	Incorporate with Adjustments	Do Not Incorporate at this time
1.2 State and Federal Rules and Requirements Should Be Included and Explained in the Narrative of WMPs	1.1 Topical Organization by WMP Program with a Focus on Lessons Learned	3.6 Resolving California Utilities' Resource Constraints
1.4 Strike a Balance Between Data Submission Requirements, Quarterly Reporting and Program Implementation	1.3 Submission Schedules that Set Up All Parties for Success	4.1 Develop an Electric Utility Resiliency and Risk Reduction Threshold (SHEUR)
2.4 Standardized Data to Allow Cross-Utility Comparisons	2.1 Risk Spend Efficiency (RSE) Analysis Required for Each Mitigation Measure	6.1 The Wildfire Safety Division Should Remain at the CPUC
3.3 Reporting Expert Qualifications and Scientific Justification for Decision-Making	2.2 Train and Retain Qualified Electrical Workers	6.2 Future Issues for Consideration
4.2 Community Outreach and Emergency Preparedness Performance Metrics and Data Reporting	2.3 Risk Assessment and Mapping to Determine Location of Wildfire Mitigation Measures and Update CPUC Fire-Threat Maps More Frequently	

	3.1 Scientific Review of Modeling Methods and Assumptions	
	3.2 Development of a Data Access Portal for Interconnected Data Repositories (interim step)	
	3.4 Robust Training Programs and Workforce Equity	
	3.5 Aligning Vegetation Management Practices with Best Available Science	
	3.7 Wildfire Mitigation Program Cost Review and Costs Recovery (interim step)[5]	

Table 1.2 Safety Culture recommendations

Fully Incorporate	Incorporate with Adjustments	Do Not Incorporate at this time
N/A	5.1 Develop a Unit Within or Outside of the Utility, to Study Black Swan Events and Predict Potential Future Events	5.2 Insert Safety Language into Investor Owned Utility Board Member Job Descriptions
		5.3 Ensure Consistent Compliance with High-Level Safety Standard

[5]Cost-reasonableness review is statutorily precluded for the WMP. 2021 WMP guideline recommendations intend to identify each electrical corporation's ratepayer cost increases for implementing its WMP programs and initiatives.

		5.4 Post-Accident Debriefing and Learning

Recommendations that were not incorporated may also be longer-term processes that utilities may not be able to fully implement before the 2021 WMP update.

The Commission has evaluated the WSD's discussion of the WSAB recommendations above and in Attachment 1 and is satisfied with the treatment given those recommendations.

2. **Attachment 2.1: Changes to WMP Guidelines**

   Attachment 2.2: 2021 WMP Guidelines Template

   Attachment 2.3: 2021 Performance Metrics Data Template

   Attachment 2.4: 2021 Maturity Model

The WMP requirements are generally the same as in 2020 but have been restructured for streamlined reporting and evaluation. Definitions of metrics have been clarified and tables have been altered to improve overall reporting structure.

Key changes in the 2021 process over 2020 include the following required elements:

a. A revised standard WMP format (Attachment 2.1) for all WMP filers is required so WMPs all include similar information in the same format.

b. The revised format streamlines the data presented in the WMPs by eliminating duplication and certain data that will be provided to the WSD via quarterly data submissions in Geographic Information System (GIS) format.

c. Standard data is required of all WMP filers, in tabulated form, with additional and supporting GIS data so wildfire mitigation plan assessments are increasingly guided by data. Use of data focused on key drivers of utility ignition risk should help alleviate the risk of catastrophic wildfire over time and allow for tracking of electrical corporation progress and compliance.

d. The revised template (Attachment 2.2) includes a "completeness checklist" detailing the 22 statutory requirements of AB 1054.

e. The revised template includes tables for summarizing the projected costs of mitigations proposed in the WMP, with a column for actual 2020 expenditures.

f. The revised template includes a table for estimates of the ratepayer impacts of proposed mitigation expenditures.

g. To consolidate data and analysis related to PSPS, the revised WMP Template includes a PSPS section.

h. The Performance Metrics Data Template (Attachment 2.3) is an Excel spreadsheet for reporting non-spatial data,[6] which the WSD will require on a quarterly basis to align with GIS data submissions.

i. There are no recommended substantive changes to the "maturity model" (Attachment 2.4). This document requires WMP filers to complete a survey reporting current wildfire mitigation practices in 52 categories, as well as planned improvements in each category over the next three years. The WSD conducts a maturity assessment to assess the filer's ability to reduce wildfire risk and its corresponding maturity level, which will be included as part of the WSD's 2021 WMP evaluation

The Commission has reviewed each of the Attachments and finds they appropriately update the WMP submissions to meet concerns raised in the last review.

3. Attachment 3: Changes to WMP Process

All provisions of WSD-001 remain in place for the 2021 WMP submission process. Three major recommendations are adopted to address the key challenges in the WMP timeline, schedule and process:

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[6] Non-spatial data refers to the tables embedded in the WMP Guidelines embedded in Attachment 2.2.

A. Phased approach to WMP submissions and review

The challenging task of reviewing all WMPs in a statutorily imposed 90-day period showed that the WSD and stakeholders need additional time and resources to properly evaluate each WMP. The data request process also proved difficult for both the WSD and electrical corporations and impinged on the 90-day review period.

For the 2021 WMP cycle, it is important to implement key changes to reduce constraints on the process. The 2021 WMP timeline will follow a modified approach, in which large utilities and SMJUs/ITOs submit WMPs one month apart. This phased approach will allow the WSD more time to review each WMP, and smaller IOUs more time to prepare their WMPs.

B. Quarterly Report data submission supplants some annual requirements

An annual data submission process is not ideal for utilities, the WSD, or stakeholders. It is challenging for utilities to provide complete data along with the WMP narrative within the two-month WMP preparation window.[7] For the WSD and stakeholders, annual data is too infrequent to meaningfully track utility progress, outcomes and prepare for subsequent WMP reviews.

By replacing some data requests to supplement the annual WMP with data in the quarterly reports, these problems are addressed. Quarterly reports enable the WSD to monitor utility data more frequently and shift the data review to the off-season months. Insights generated from the quarterly reports reduce analysis time during annual WMP review, leading to a faster review process.

The quarterly report structure is not identical to the WMP data requirements. Therefore, for 2021, all annual data requirements are moved into the quarterly report (spatial and non-spatial) format, and data requirements are removed from the annual WMP. This reporting schedule replaces that adopted in Resolution WSD-002. 2020 Class B deficiencies and conditions requiring ongoing reporting are still required and will be submitted alongside the new quarterly data submissions according to the schedule adopted herein, rather than according to

[7] In accordance with § 8389 (d), the Commission is required to annually approve the WSD's recommendations on WMP requirements among other things. Traditionally, the schedule for WMPs requires an early February submittal – providing approximately two months between Commission approval of WMP requirements and the filing deadline.

the schedule adopted in Resolution WSD-002.The insights generated from quarterly reports should reduce analysis time during the annual WMP review, leading to a faster and higher quality review process. The WSD may modify the quarterly report schedule or cadence as deemed necessary via written notice to stakeholders.

C. 2021 Filing and Action Timetable

The 2021 WMP timeline will follow a modified approach, in which large utilities and SMJUs/ITOs will submit WMPs one month apart. This phased approach will allow the WSD more time to review each WMP, and smaller IOUs more time to prepare their WMPs. The WSD may modify the 2021 WMP schedule as deemed necessary via written notice to stakeholders subject to the statutory parameters set forth in § 8386(b).[8]

Table 2: 2021 WMP Cycle Timeline for PG&E, SCE and SDG&E

Date	Action
February 5, 2021	WMP submission deadline for large IOUs
February 23-24, 2021	WSD Workshops for large IOUs
March 17, 2021	Public Comments due for large IOU WMPs
March 24, 2021	Reply Comments due for large IOU WMPs[9]
May 2021	WSD published draft resolution(s) and action statements for large IOU WMPs
June 2021	Earliest date Commission may ratify WSD resolution(s)

Table 3: 2021 WMP Cycle Timeline for SMJUs and ITOs

Date	Action
March 5, 2021	WMP submission deadline for SMJUs/ITOs
March 23, 2021	WSD Workshops for SMJUs/ITOs

[8] "In calendar year 2020, and thereafter, the plan shall cover at least a three-year period. The division shall establish a schedule for the submission of subsequent comprehensive wildfire mitigation plans, which may allow for the staggering of compliance periods for each electrical corporation. In its discretion, the division may allow the annual submissions to be updates to the last approved comprehensive wildfire mitigation plan; provided, that each electrical corporation shall submit a comprehensive wildfire mitigation plan at least once every three years."

[9] Any stakeholder may submit reply comments.

April 14, 2021	Public Comments due for SMJU/ITO WMPs
April 21, 2021	Reply Comments due for SMJU/ITO WMPs
June 2021	WSD published draft resolution(s) and action statements for SMJU/ITO WMPs
July 2021	Earliest date Commission ratify WSD resolution(s)

The Commission is satisfied that the more regular data submissions and the timing changes the WSD recommends will improve the WMP review process for the WSD, the Commission and stakeholders.

4. Attachment 4: Annual Safety Culture Assessment Process

Pursuant to § 8389, by December 1, 2020, and annually thereafter, the Commission, after consultation with the WSD, must adopt and approve a process for the WSD to conduct annual safety culture assessments for each electrical corporation subject to the Commission's jurisdiction.

The WSD's annual Safety Culture Assessment is distinct from the broader safety culture assessment required of the Commission by § 8386(2). The WSD's annual Safety Culture Assessment will focus on foundational components of safety culture and components specific to wildfire risk. The WSD may phase in the proposed elements of the WSD's annual Safety Culture Assessment and may deploy a streamlined Safety Culture Assessment for SMJUs/ITOs.

The WSD will use assessment tools focused on whether electrical corporations are building a wildfire safety culture:

- An electrical corporation workforce survey intended to assess culture in areas particularly relevant to wildfire;
- An organizational self-assessment on elements of organizational policies and practices that heavily influence culture as well as each electrical corporation's targets and plans to improve;
- Safety governance documentation focused on lessons learned, evidence supporting the organizational self-assessment, detail regarding plans to improve, compliance with Board structure requirements pursuant to § 8389(e)(5) and § 8389(e)(3), and verifications of compliance with past related Commission directives, as applicable;

- Interviews and observational visits, as necessary.

The Commission has reviewed the WSD's Safety Culture Assessment proposals and Attachment 4 and is satisfied that the materials appropriately focus on safety culture in the wildfire context.

IV. COMMENTS

A draft of this Resolution was served on the service list of R.18-10-007, noticed on the Commission's Daily Calendar, and posted on the WSD's website (www.cpuc.ca.gov/wsd) on October 12, 2020. Pursuant to Rule 14.5 of the Commission's Rules of Practice and Procedure and Resolution WSD-001, comments on the Draft Resolution could be submitted by any stakeholder.

On November 2, 2020, the following stakeholders submitted timely comments: California Association of Small and Multi-Jurisdictional Utilities, Green Power Institute (GPI), Mussey Grade Road Alliance, Pacific Gas and Electric, Protect Our Communities Foundation, Public Advocates Office (Cal Advocates), San Diego Gas & Electric, Southern California Edison, and The Utility Reform Network.

The following is a synopsis of modifications made based on comments. In addition, minor changes to fix typographical errors, improve clarity or flow have been made throughout the appendices.

1. In response to SDG&E's comments that initiatives should be reported in flexible units to accurately reflect target metrics, utilities are permitted to report initiative scope in the units they use to track each initiative (e.g. number of fuses replaced for fuse replacement initiatives). However the utilities will still be required to report in circuit line miles to facilitate comparison across utilities.

2. In response to comments raised by PG&E and SCE, the 2023 projection data requirements have been removed.

3. In response to comments by Cal Advocates, the Commission agrees that Red Flag Warning (RFW) circuit miles should only reflect circuits impacted by RFW days. Therefore, the normalization of RFW circuit mile days has been adjusted to exclude undergrounded lines (noted as overhead (OH) circuit miles). Similar adjustment has been made to exclude undergrounded lines from the metric for High Wind Warning circuit mile days. In addition, definitions for "circuit mile" and "line mile" have been

added to the WMP glossary. Utilities are also required to provide projected targets for their reported program target metrics (e.g. projected 2022 target).

4. In response to comments from Cal Advocates, utility WMP workshops have been moved one week earlier while public comment dates have not been shifted. A clarification has also been added that any stakeholder may submit comments and reply comments.

5. In response to GPI's comments regarding reporting of updates on progress since 2020, a new Guidelines Section 4.6 has been added that requires the utilities to report progress on 2020 WMP deficiencies. In addition, the characterization of WSAB's recommendation 2.1 has been changed to "partially incorporated" (*see* Attachment 2.1) since risk-spend efficiency is delineated by High Fire Threat District level, rather than circuit level, as was originally recommended by the WSAB.

6. In response to GPI's comments, Section 4.4 of the WMP Guidelines has been modified to include discussion on results. Further, in Maturity Model capabilities 24 and 25, the words "vegetation waste" have been modified to include vegetation residue. The words now appear as "vegetation waste/residue."

7. In response to comments to Protect our Communities, the WMP Guidelines have been updated to clarify that, when referencing specific statutes and directives, this includes Commission directives.

8. In response to SCE's comment that the Safety Culture Assessment will require significant additional resources that need to be balanced with existing safety culture efforts and other utility objectives, Safety Culture Assessment planning meetings will be set to determine the amount of work required from IOUs. This meeting will enable the WSD to tailor how the Safety Culture Assessment will be administered for each IOU.

9. Finally, the Commission acknowledges comments from the IOUs regarding the volume and scope of quarterly data reporting requirements. The WSD will continue to work with stakeholders to ensure these requirements can be met. No changes are made to the data reporting requirements at this time.

FINDINGS

1. AB 1054 and Commission Resolution WSD-001 require all California electrical corporations and independent transmission owners (ITOs) to file a Wildfire Mitigation Plan update for 2021 that conforms with Pub. Util. Code § 8386(c) and guidance provided by the WSD and served on the Rulemaking 18-10-007 service list as part of this resolution.
2. AB 1054 requires the WSD to consider and evaluate recommendations from the Wildfire Safety Advisory Board that were included in the WSAB June 24, 2020, Final Report.
3. The WSD's incorporation of many of WSAB's recommendations input is appropriate. Other WSAB recommendations are appropriately deferred to the next WMP cycle.
4. Pub. Util. Code §§ 8386(d)(1), (2) and (4) require the Commission to adopt, after consultation with the WSD, the following: (1) performance metrics for electrical corporations, (2) additional requirements for wildfire mitigation plans, and (4) a process for the division to conduct annual safety culture assessments for each electrical corporation. This Resolution with its Attachments meets each of the foregoing requirements.
5. The WMP review schedule herein appropriately balances the needs of stakeholders, the Commission and the WSD. The WSD may modify the 2021 WMP schedule as deemed necessary via written notice to stakeholders subject to the statutory parameters set forth in § 8386(b).
6. The WSD may modify the quarterly report schedule or cadence as deemed necessary via written notice to stakeholders.
7. The WSD may modify the 2021 Safety Culture Assessment schedule, as deemed necessary, via written notice to stakeholders.
8. The WSD may phase in elements of the proposed Safety Culture Assessment and may deploy a streamlined Safety Culture Assessment for SMJUs/ITOs as set forth in Attachment 4.
9. The Attachments to this Resolution reasonably address the requirements of §§ 8386(d)(1), (2) and (4).

THEREFORE, IT IS ORDERED THAT:

1. The contents in Attachments 1, 2.1, 2.2, 2.3, 2.4, 3, and 4 spell out electrical corporations' obligations pursuant to Pub. Util. Code §§ 8386(d)(1), (2) and (4) are hereby adopted.

2. Electrical corporations shall adhere to the requirements of this Resolution and its Attachments in their 2021 Wildfire Mitigation Plans.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on November 19, 2020; the following Commissioners voting favorably thereon:

/s/ RACHEL PETERSON
Rachel Peterson
Acting Executive Director

MARYBEL BATJER
President
LIANE M. RANDOLPH
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
Commissioners