

PUBLIC UTILITIES Commission

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VIA ELECTRONIC FILING AND EMAIL

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Subject: The Public Advocates Office's Comments on Draft Resolution WSD-020 and the Office of Energy Safety's Draft Action Statement on Southern California Edison Company's (SCE's) 2021 Wildfire Mitigation Plan (WMP) Update Pursuant to Public Utilities (P.U.) Code Section 8386.

Pursuant to Rule 14.5 of the California Public Utilities Commission's (Commission's) Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby submits Opening Comments on the Draft Resolution WSD-020 issued by the Commission, and the Draft Action Statement issued by the Office of Energy Infrastructure Safety (Energy Safety)¹

¹ At the time Cal Advocates submitted its comments on the 2021 WMP, Energy Safety was part of the California Public Utilities Commission and was referred to as the Wildfire Safety Division. Cal Advocates will use Energy Safety for consistency throughout these comments.

pursuant to P.U. Code Section 8386.² WSD-020 will be on the agenda at the August 19, 2021 Commission meeting. These comments are timely submitted on August 5, 2021.³

I. INTRODUCTION AND BACKGROUND

On July 16, 2021, Energy Safety issued a Draft Action Statement on SCE's 2021 WMP Update. On the same day, the Commission issued Draft Resolution WSD-020, which included Energy Safety's Draft Action Statement as an attachment. WSD-020 would ratify Energy Safety's Draft Action Statement, require SCE to meet the commitments in its 2021 WMP Update, and require SCE to fulfill certain additional obligations.

II. DISCUSSION & RECOMMENDATIONS

In its Draft Action Statement, Energy Safety lists 14 key areas for improvement for SCE's 2021 WMP Update, as well as the associated remedies for those issues. Furthermore, throughout the Draft Action Statement, Energy Safety discusses several other issues that SCE should improve on by its 2022 WMP Update. Cal Advocates supports the Draft Action Statement and agrees with several of the remedies proposed by Energy Safety. Therefore, Cal Advocates urges the Commission to adopt Draft Resolution WSD-020 ratifying Energy Safety's Draft Action Statement.

A. Cal Advocates supports the use of workshops to evaluate the use of covered conductor.

Energy Safety notes in its Draft Action Statement that "The rationale to support the selection of covered conductor as a preferred initiative...lacks consistency among the utilities."⁴ As a remedy, Energy Safety, through the Draft Action Statement, would require the utilities to coordinate amongst themselves in order to determine the effectiveness of covered conductor when compared to other initiatives.⁵ The Draft

² See Energy Safety website, Docket # 2021-WMPs, REF # (Doc. No.) 10247 (hereinafter Draft Action Statement).

³ Comment Letter of Draft Resolution WSD-020.

⁴ Draft Action Statement, p. 10.

⁵ Draft Action Statement, p. 10-11.

Action Statement also requires SCE to evaluate the scope of its covered conductor deployment in the context of its updated Wildfire Risk Models.⁶

In Cal Advocates' comments on the SCE 2021 WMP Update and on SCE's Response to WSD's Revision Notification, we commented on the prioritization of SCE's covered conductor program. Cal Advocates stated that the deployment of covered conductor should be in alignment with the highest risk circuits.⁷ Similarly, Cal Advocates noted in comments on the SCE response to the WSD's Revision Notification that technical workshops should be held to evaluate the efficacy of covered conductor deployment.⁸ Cal Advocates supports Energy Safety's efforts to fully evaluate the use of overhead covered conductor, and how SCE's deployment of covered conductor compares to the other utilities.

B. Cal Advocates supports Energy Safety's requirement for SCE to coordinate with other utilities to develop a more consistent approach to creating risk models.

In its Draft Action Statement, Energy Safety states that the utilities do not have a consistent approach to wildfire risk models.⁹ To remedy this issue, Energy Safety would require the utilities to collaborate in a working group to develop a more consistent approach to modeling wildfire risk. Cal Advocates supports imposing this requirement on SCE and the other utilities. In its own comments, Cal Advocates stated that Energy Safety should convene a series of technical working groups to examine risk modeling practices.¹⁰ Reviewing utility risk models and any changes that the utilities make to their models prior to WMP filings will facilitate stakeholders' efficient review during the WMP review period.

⁶ Draft Action Statement, pp. 11-12.

⁷ Comments of the Public Advocates Office on the 2021 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities, March 29, 2021 (Cal Advocates Comments on 2021 WMP updates of Large IOUs), pp. 7-8.

⁸ Comments of the Public Advocates Office on Southern California Edison Company's (SCE) June 3, 2021 Revision of its 2021 Wildfire Mitigation Plan Update, June 10, 2021, p. 6.

⁹ Draft Action Statement, p. 10.

¹⁰ Cal Advocates Comments on 2021 WMP updates of Large IOUs, p. 34.

C. Cal Advocates supports Energy Safety’s requirement to develop a more consistent approach to Risk Spend Efficiency.

Energy Safety notes that there is a lack of consistency among the utilities’ Risk Spend Efficiency (RSE) estimates.¹¹ Cal Advocates agrees with Energy Safety’s finding that RSE estimates between the different utilities should be comparable, especially when evaluated relative to other mitigations within a particular WMP. By holding technical workshops to address this issue, stakeholders would be better able to judge the cost effectiveness of WMP initiatives with an understanding of how the initiatives of one utility compare to its peers. Just as importantly, having a more transparent and consistent approach to RSE would allow the utilities to better determine how the risk portfolios of other utilities compare to their own and determine what the causes of any differences in RSE estimates might be.

D. Cal Advocates supports Energy Safety’s findings on additional issues.

Beyond the issues noted above, Energy Safety lists several issues throughout its Draft Action Statement that align with Cal Advocates’ earlier comments on SCE’s 2021 WMP Update.¹² Specifically, Cal Advocates supports the following remedies from Energy Safety:

- 1) SCE must provide RSE estimates for PSPS-related activities.
- 2) SCE must develop a means to collect accurate C-hook information and a plan to properly prioritize C-hook replacements.
- 3) SCE must evaluate the broader application of drone inspections.
- 4) SCE must address the issues that prevented completion of pole-loading inspections.

III. CONCLUSION

Cal Advocates respectfully requests that the Commission adopt the recommendations contained herein.

¹¹Draft Action Statement, pp. 9-10.

¹² See generally Cal Advocates Comments on 2021 WMP updates of Large IOUs, pp. 7-13.

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