

12/02/2021

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Comments on the Office of Energy Infrastructure Safety's Draft 2022 Wildfire Mitigation Plan Update Guidelines

Director Thomas Jacobs,

Pursuant to the Office of Energy Infrastructure Safety's (Energy Safety) November 9, 2021 Draft 2022 Wildfire Mitigation Plan (WMP) Update Guidelines (Draft Guidelines), Southern California Edison Company (SCE) submits these Comments.

INTRODUCTION

SCE appreciates Energy Safety issuing the Draft Guidelines and related attachments in early November allowing utilities to begin organizing and developing their 2022 WMP Update. SCE further appreciates this opportunity to provide comments on Energy Safety's proposals. SCE has reviewed the draft proposals and agrees with Energy Safety's intent to improve the WMP reporting and processes by 1) clarifying WMP reporting guidelines and 2) streamlining the WMP submission and evaluation processes.¹ While SCE supports these objectives, some changes are needed for clarification and streamlining purposes. Additionally, the Draft Guidelines include new requirements and metrics that conflict with California Public Utilities Code (PUC) Section 8389(d). SCE addresses its concerns with the Draft Guidelines and related attachments below.

THE DRAFT GUIDELINES INCLUDE NEW REQUIREMENTS AND METRICS THAT CONFLICT WITH PUC SECTION 8389(D)

Energy Safety's Draft Guidelines include several process and administrative changes such as organization and presentation of data/information, staggering of WMP submission deadlines, clarifying terminology, and requiring the use of cross-referencing. While these revisions do not add requirements nor new performance metrics, Energy

¹ Draft Guidelines, Attachment 1, p. 3.

Safety also proposes several “technical” changes that add new requirements and new metrics putting them in conflict with PUC Section 8389(d).² In CPUC Resolution M-4860, approved by the CPUC on today’s date, the Commission adopts Energy Safety’s Recommendation to *continue* the performance metrics used to evaluate the 2021 WMP Update and to *maintain* the existing WMP requirements³ (emphasis added). The CPUC notes in Resolution M-4860 that “both SCE and SDG&E assert [in comments on the Draft Resolution] that the Draft 2022 WMP Update Guidelines Energy Safety issued on November 9, 2021 impose significant new requirements that are more appropriately considered ‘additional requirements’ and thus are subject to Commission approval.”⁴ The CPUC agrees that “WMP requirements must be authorized by the Commission pursuant to Pub. Util. Code Section 8389(d)(2)” and that “Energy Safety may require electrical corporations to include ‘[a]ny other information that the Wildfire Safety Division [Energy Safety] may require’ in the WMPs”, citing Public Utilities Code Section 8386(c)(22).⁵ The CPUC states that it “believe[s] Energy Safety, with input from the electrical corporations and other stakeholders, will appropriately distinguish ‘additional requirements’ from additional information as it finalizes the 2022 WMP guidelines.”⁶

PUC Section 8389(d)(2), which requires CPUC approval for new WMP “requirements,” and PUC Section 8386(c)(22), which states the WMP can include “any other information [Energy Safety] may require” present a possible statutory ambiguity, but SCE believes this statutory language can be reconciled by considering the scope of new WMP information sought to be required and the level of effort required by electrical corporations to provide it (assuming it is feasible to do so). Since WMPs are entirely composed of “information,” interpreting Section 8386(c)(22) to include any additional information requirements whatsoever would effectively render Section 8389(d)(2) meaningless. Per the above discussion, the changes Energy Safety seeks via the Draft Guidelines go beyond minor supplementation of information and include significant new metric and additional data changes that rise to the level of “additional requirements” and “new performance metrics” that would need CPUC approval prior to implementation. Such requirements should be removed from the final 2022 WMP Update Guidelines.

Pursuant to Resolution M-4860, SCE looks forward to providing—along with other stakeholders—additional input to Energy Safety on distinguishing “additional requirements” and “new performance metrics” from “additional information” for purposes of finalizing the 2022 WMP Update Guidelines.

² For example, requirements to provide 2023 performance data and costs, territory-wide data, and new geospatial requirements go well beyond the 2020 and 2021 WMP Guidelines. Further, Energy Safety describes its technical changes as “new metrics, additional non-spatial data requirements, substantiation of risk modeling methods and decision-making processes, and discussion of model uncertainties” (Attachment 1, p. 3) and states that the Draft Guidelines “include new requirements and updates” (Attachment 1, p. 6). These technical changes are not minimal and more appropriately should be considered “additional requirements” and new “performance metrics” as they require utilities to provide information that was not previously necessary.

³ CPUC Resolution M-4860, Sections (d)(1) and (d)(2).

⁴ CPUC Resolution M-4860, p. 10.

⁵ *Id.*

⁶ *Id.*

CORRECTIONS TO THE DRAFT GUIDELINES ARE NEEDED

The Draft Guidelines provide instructions to include new comprehensive visual aids such as maps, tables, figures, diagrams, charts, photographs, and other supporting documentation. In some instances, these new requirements are infeasible. Others may result in a product that does not serve the goals of Energy Safety. SCE provides specifics (and alternatives, where possible) as follows:

- Energy Safety requires new geospatial maps (beyond the requirements in the GIS Data Reporting Standard, v.2.1) for Grid Design and System Hardening mitigations planned within certain 2022 time periods, the next 3 years, and the next 10 years. SCE does not determine the location of its wildfire mitigation initiatives out to 10 years. Thus, providing a map with wildfire mitigation initiatives for the next 10 years would be extremely speculative and as such, of minimal value to Energy Safety. Further, most programs will not be geolocated beyond 2022, making even the 3-year requirement fairly speculative at best. While SCE has preliminary forecasts beyond 2022 for some mitigations, improvements in risk modeling, prioritization, mitigation effectiveness, etc., render those forecasts speculative as SCE anticipates continually improving its ability to target, plan and prioritize mitigations in the highest risk areas. SCE expresses similar concerns with ease of viewability and availability of data for the new map requirements associated with asset management and inspections and enhanced clearances. Accordingly, SCE recommends Energy Safety remove the geospatial requirements for the next 3 and 10 years and instead, as SCE has historically provided, change the requirement to what is currently planned and geolocated.
- The new requirement for Table 2 to document various outcome metrics by wind warning status and high fire threat district (HFTD) tier are in many cases infeasible and others necessitate significant additional effort with potentially imprecise results. In order to provide such metrics by Red Flag Warning (RFW) days, High Wind Warning (HWW), and/or HFTD Tier, both temporal and geospatial data points are needed. Temporal and/or geospatial data associated with the value of assets and structures damaged or destroyed, acreage burned, injuries, and fatalities are unavailable with any sort of consistency. As such, those metrics cannot be broken down by RFW, HWW, and/or HFTD. Similarly, for many outages, the specific location is unknown. As an alternative, SCE can assume, for instance, that the outage is associated with a circuit's source-side device (i.e., the upstream circuit breaker at the source substation), which could be miles away from the actual outage. It is unclear if such an estimate will suffice for Energy Safety's purposes. Accordingly, SCE recommends Energy Safety remove these new metrics.
- A map with all electrical infrastructure and multiple data layers would not be readable in the WMP. Even if it were to be divided into smaller maps, the end result would be scores, if not hundreds, of pages of maps in order to be usable. Instead, SCE recommends that Energy Safety amend the requirement to a geodatabase file instead of maps, which would provide more utility to Energy Safety. Utilities could also then use their expertise to include some pdf maps that provide illustrative benefit by tying to the narrative.

- New map requirements to provide all electrical infrastructure with additive layers like RFW days, HWW frequency, as well as maps for distribution of Access Functional Need (AFN) customers, wildland-urban interface (WUI), and urban/rural/highly rural customers, and disadvantaged communities in a utility’s service territory do not specify the RFW and HWW time period. SCE recommends the last five years, where available, given the higher relevance of more recent weather data.
- The new requirement to include 2023 scope, cost, and rate forecasts would essentially transform what is intended to be an update to the 2020-2022 WMP period to an entirely new 2020-2023 WMP.⁷ SCE believes that this is not Energy Safety’s intention and accordingly requests that this requirement be removed. If the requirement for 2023 scope, cost, and rate forecasts remain, Energy Safety must understand that any 2023 targets, costs, etc. are preliminary and will change, and thus no compliance requirements should be associated with them.
- The 2022 WMP Update submission timeline, included in Attachment 5, provides dates and actions for WMP-related activities. SCE requests Energy Safety adjust and modify the submittal dates for Quarterly Data Reports (QDRs) to 45 days after the end of each quarter. Given the date changes associated with staggering the IOU’s WMP submissions, extending the due date for QDRs another 15 days should not impair Energy Safety’s review, but will allow more time for utilities to provide higher quality reports, reducing the instances of data corrections in subsequent reporting periods, and providing for a more streamlined review process.

CONCLUSION

SCE appreciates the opportunity to submit its Comments on the Draft Guidelines and related attachments. Given the immediacy of the deadline for submitting the 2022 WMP Updates, SCE requests that Energy Safety submit its final guidelines as soon as reasonably possible.

If you have any questions, or require additional information, please contact me at gary.chen@sce.com.

Sincerely,

//s//

Gary Chen
Director, Safety & Infrastructure Policy
Southern California Edison

⁷ The Draft Guidelines state that “2022 is the final year of the 3-year plan cycle (2020-2022)” and “Changes are minimal to enable comparison across 2020-2022 WMPs.” Draft Guidelines, Attachment 1, p. 6.