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Caroline Thomas Jacobs, Director
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California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Reply Comments to Public Comments on Southern California Edison Company's 2022 Wildfire Mitigation Plan Update

Dear Director Thomas Jacobs,

Pursuant to the Office of Energy Infrastructure Safety's (Energy Safety) 2022 Wildfire Mitigation Plan (WMP) Update Guidelines, Attachment 5: Guidelines for Submission and Review of 2022 WMP Updates, Southern California Edison Company (SCE) respectfully submits these Reply Comments responding to the Public Comments filed on April 11, 2022. Parties that submitted comments included: William B. Abrams (Abrams); Public Advocates Office (Cal Advocates); the California Department of Fish and Wildlife (CDFW); the Green Power Institute (GPI); the Mussey Grade Road Alliance (MGRA); The Rural County Representatives of California (RCRC); and The Utility Reform Network (TURN).

Collectively, the parties proposed dozens of recommendations directed to all utilities or to SCE in particular, and many more were directed to other utilities. The vast majority of parties' recommendations are not focused on the pending 2022 WMP Update, but on future WMPs, and no party has recommended that SCE's 2022 WMP Update not be approved. The focus on future WMPs is appropriate, given that it would not be feasible to incorporate most, if any, such recommendations into the 2022 WMP Update in light of the schedule for review and approval. For example, there are several recommendations regarding risk modeling, which should be addressed in upcoming Energy Safety-led risk modeling working group sessions. Further, risk modeling should be informed by and aligned with related outcomes from the California Public Utilities Commission's (CPUC or Commission) ongoing Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities (R.20-07-013) (Risk OIR), consistent with the principles set forth in the Memorandum of Understanding between the Commission and the Office of Energy Infrastructure Safety (MOU). SCE understands that Energy Safety will be implementing a process to update future WMP guidelines and looks forward to

working collaboratively with Energy Safety and stakeholders on the development of those revised guidelines.

Given the high number of recommendations and the fact that many parties' Comments substantially overlap, SCE has limited its responses to the most salient comments on particular subjects. SCE has indicated where it explicitly agrees with particular recommendations. SCE's silence on any particular stakeholder proposal should not be interpreted as acceptance of, agreement to, or acquiescence with that proposal.

REPLY TO PARTY COMMENTS

I. PROPOSED CHANGES TO 2023 WMP GUIDELINES

A. CAL ADVOCATES PROVIDES REASONABLE RECOMMENDATIONS THAT SHOULD BE CONSIDERED FOR THE 2023-2025 WMP CYCLE

Cal Advocates offers several recommended modifications to future WMP processes and guidelines.[1] SCE appreciates Cal Advocates' focus on advanced planning for future WMPs and generally agrees with several of Cal Advocates' recommendations, including the following:

- Energy Safety should convene meetings with stakeholders to discuss improved guidelines for the 2023-2025 WMP cycle.
- Energy Safety should clarify the differences between comprehensive WMPs and updates
- Energy Safety should initiate a reassessment of the WMP process by early June 2022.
- Energy Safety should adopt final WMP guidelines by September 2022.[2]

SCE appreciates that Energy Safety has already scheduled a workshop on April 22nd to commence discussions on 2023-2025 WMP Guidelines. SCE agrees with Cal Advocates' recommendations to initiate a reassessment of the WMP process by early June and have final WMP guidelines adopted by September 2022. The WMP is a voluminous document with many specific requirements, and it involves several hundred individuals from across SCE to produce each year. It takes substantial time to organize and develop not only the final WMP itself, but also to perform the analyses and develop the strategies that are required to inform the content of the WMP. The quarterly reports add additional requirements that consume many of the same resources. Further, utility business and operational planning processes are structured throughout the year and IOUs are now on four-year GRC cycles, and it would be beneficial to incorporate any

[1] Comments of the Public Advocate's Office on General Issues in the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities ("Cal Advocates Comments on 2022 WMP Updates ") at pp. 23-25.
[2] *Id.*, p. 4, 23-24.

new guidance on WMP requirements as early as possible into those processes. SCE is encouraged that Energy Safety is performing advanced planning for the next WMP in parallel to reviewing utilities' 2022 WMP Updates and stands ready to support those processes.

Cal Advocates also provides recommendations that warrant additional consideration:

- "Energy Safety should stagger the comprehensive filing years so that the electric utilities do not all file comprehensive WMPs in the same year.
- Energy Safety should schedule WMP submissions in advance of the planning year, to emphasize more proactive planning.
- Energy Safety should seek out ways of encouraging greater public participation in wildfire mitigation issues.
- Energy Safety should follow the upcoming workshop on WMP guidelines with a written workshop report, then stakeholder comments and replies. Subsequently, Energy Safety should prepare a staff proposal on 2023 guidelines and permit stakeholders to file comments and replies on the staff proposal."[3]

Some of these – such as the staggering of comprehensive filings and the timing of utility WMP submissions – should be more fully evaluated consistent with Public Utilities Code Section 8386[4] and in the context of the timing of other related regulatory proceedings and internal utility business and operational planning processes. SCE generally agrees with the tenets of Cal Advocates' recommendation to have a written workshop report, stakeholder comments, and a staff proposal for which to comment, but only if those activities can be performed expeditiously so as to not extend the issuance of the final WMP guidelines.

II. RISK MODELING

Parties provided numerous recommendations regarding risk modeling, including variables, frameworks and calculations. SCE appreciates these ideas and looks forward to considering and evaluating these concepts as part of our continuously improving risk modeling efforts. Risk modeling is a particularly time- and data-intensive activity, and changes to model inputs, outputs and model result application can have unintended impacts. It is essential that any proposed modifications be carefully evaluated by all

[3] *Id.*, p. 4, 23-25.

[4] "Each electrical corporation shall annually prepare and submit a wildfire mitigation plan to the Wildfire Safety Division for review and approval. 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." Cal. Pub. Util. Code § 8386(b).

stakeholders. Therefore, these recommendations are likely best served by stakeholders discussing them in the pre-established Energy Safety risk modeling working group meetings and/or other forums that can sufficiently evaluate each recommendation with due consideration.

Further, modifications to risk modeling should be informed by and aligned with the Risk OIR and SCE's Risk Assessment Mitigation Phase (RAMP) proceedings currently pending before the Commission. A Memorandum of Understanding between the California Public Utilities Commission and the Office of Energy Infrastructure Safety (MOU) notes that:

"Government Code Section 1547[6] directs the CPUC and Energy Safety to cooperatively develop consistent approaches and share data related to infrastructure safety. CPUC and Energy Safety share the following priorities for effective communication and coordination: (1) Work together to develop consistent approaches and policies towards public safety, including but not limited to approaches and policies regarding utility wildfire safety, prevention, and mitigation actions. (2) Assist one another in preparing for, responding to, and mitigating the effects of public safety risks associated with energy infrastructure, including but not limited to wildfires and de-energization events.

…

Areas requiring such information sharing between the Parties may include, but are not limited to:…(o.) Wildfire safety-related risk assessments such as Risk Assessment Mitigation Phase (RAMP) and Safety Model Assessment Proceeding (SMAP)."[5]

Further supporting this point, in its draft Phase II Roadmap for the Risk OIR, the CPUC indicated its intent to align with the work being led by Energy Safety related to wildfire risk modeling in utility WMPs. In relevant part, the Commission states that:

"Priorities for Phase II are based on the collective response from parties and priorities of the California Public Utilities Commission (CPUC). If it becomes apparent that Phase II can address additional issues over the next several months, SPD will work with parties in the proceeding to make as many improvements to the RDF as possible. These efforts will be coordinated with Energy Safety's efforts to refine the methodologies and requirements for Wildfire Mitigation Plans (WMP) to help ensure that the risk analysis and mitigation efforts are consistent and complementary rather than conflicting, as appropriate or as practicable."[6]

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[5] July 12, 2021 Memorandum of Understanding between the California Public Utilities Commission and the Office of Energy Infrastructure Safety, pp. 1-3. 20210712-cpucoeis-mousigned.pdf (ca.gov)
[6] February 16, 2022 Draft Phase II Roadmap for the Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities (R.20-07-013) – Attachment, p. 1.

That said, SCE responds specifically to selected recommendations raised by parties below.

A. Changes to Multi-Attribute Value Function (MAVF) Should Be Evaluated in the CPUC's Risk OIR

Multiple parties have commented on changing the MAVF function in some fashion and associated calculations. While SCE appreciates these comments, SCE suggests these comments be considered within the larger overall risk framework that the Commission is addressing through the Risk OIR. The MAVF is a product of the S-MAP (D.18-12-014) and it would be efficient and appropriate to evaluate any proposed changes to the MAVF within the docket of the ongoing Risk OIR. Consistent with the principles of the MOU, it would be beneficial for Energy Safety to monitor the OIR as the utilities work toward developing consistent approaches and policies for risk modeling. In fact, many of the topics considered in these comments are likely topics for discussion in future CPUC-hosted workshops and Technical Working Groups (TWG) as contemplated in Phase II of the OIR. These Commission-hosted workshops and TWGs appear to provide an appropriate and efficient venue where consideration of potential changes can be discussed, analyzed, and vetted by stakeholders.

B. MGRA's Recommendations Regarding Risk Modelling Should Be Considered in Future Workshops

SCE appreciates the points raised by MGRA and looks forward to collaborating at future workshops on prudent improvements to wildfire risk modeling. MGRA offers multiple observations and suggestions for changes regarding how the utilities model risk, and the purported "errors in the utility planning methodology"[7] that result from risk modeling. MGRA states that SCE, PG&E, and SDG&E make "a critical error when they combine 'worst case' consequences with a probability of an ignition from a driver or at a location that is unlikely to occur on a 'worst case' event day"[8] and that "the current models overpredict risk for drivers that aren't more likely to occur on worst weather days."[9] SCE continues to work with the best available data, in-house fire science and engineering teams, as well as other utilities and industry experts to refine and advance our modeling approaches. SCE welcomes further discussion on how to enhance risk modeling, and how it can most productively inform mitigation planning. SCE notes that proposed changes should be considered thoughtfully, and with sufficient planning and stakeholder engagement, to avoid needless disruption or churn to the mitigation planning and execution process. Proposed changes should also take into account the quality and

[7] MGRA comments at p. 40.
[8] *Id.* at p. 31.
[9] *Id.* at p. 32.

availability of underlying data that would be needed to undertake the change in a manner that leads to credible and reasonably reliable work product.

C. GPI's Risk Modelling Recommendations Generally Should Be Reserved for Discussion in Technical Working Groups

Green Power Institute recommends that utilities provide additional information on various elements of their risk modeling practices, including MAVF value ranges, establishment of HFTD boundary areas, egress/ingress factors, integration of climate change in modeling ignition probability and consequence, and how risk planning models are informing mitigation selection and prioritization. SCE appreciates these perspectives and reiterates that these items should be considered through a comprehensive evaluation of their implications, benefits, burdens, and impacts. This may best be accomplished through more focused technical working groups and other forums. SCE responds to a few select recommendations below, and looks forward to further collaboration on these and other suggestions in the future.

GPI recommends that "all utilities be required to provide a complete description of how they are currently factoring in egress/ingress routes in their mitigation selection and work prioritization for 2022, prior to the completion of anticipated integration of egress in risk models."[10] As GPI notes, SCE has laid out a comprehensive strategy to mitigate population egress in its 2022 WMP Update. This is central to our Severe Risk Area methodology that drives our Integrated Grid Hardening Strategy as discussed in Section 7.2 of our 2022 WMP Update. As such, SCE believes its progress in this area is on track, given how egress issues, along with other relevant factors, are considered in its Integrated Grid Hardening Strategy. GPI also recommends that "IOUs should perform a more complete assessment of the possible impacts of climate change on both Probability of Ignition (PoI) and consequence."[11] SCE looks forward to discussing its approach to understanding how climate change can influence wildfire ignition risk across its HFTD. This topic is scheduled to be discussed at an upcoming Energy Safety risk modeling workshop in August.

III. VEGETATION MANAGEMENT

A. SCE's HTMP Does Not Have a Significant Level of QC Non-compliance

Cal Advocates recommends that SCE (1) "explain the rate of non-compliance in the HTMP program as part of the 2022 WMP," and (2) provide a plan in its 2023 WMP to

[10] GPI Comments at pp. 14.
[11] *Id.* at p. 5.

reduce the HTMP non-compliance rate over the next three-year WMP cycle, including quantitative targets. Cal Advocates asserts that these steps are needed because "(HTMP) appears to have a significant level of Quality Control (QC) non-compliance."[12] SCE disagrees with the characterization that HTMP has a "significant level" of QC non-compliance.

In 2021, SCE assessed approximately 131,000 trees as part of the HTMP program, and selected 15,802 of those for QC review. SCE found that, for trees initially assessed with risk scores between 35-49 (below the recommended removal/mitigation threshold of 50), after the QC process was completed, 1.2% (165 trees) were prescribed for removal.[13] The assessment of an individual tree requires evaluation of many variables and is not an exact science. It is not a measurement of a single finite value such as the distance between a line and vegetation; it is a professional judgment of the hazards presented by a tree, which is informed by numerous variables and observable conditions. Although SCE does drive for consistency by using standardized scoring criteria and conducting QC inspector training, it is difficult to eliminate all variances between different assessors evaluating the same tree. For this reason, the QC program is designed so that where there is a difference between the initial assessment and a QC assessment, a third trained arborist performs a final evaluation of the tree. This process provides reasonable assurance that trees requiring mitigation will be mitigated, notwithstanding that some variability among assessments exists.

SCE is always looking for new ways to improve its QC program by increasing uniformity across inspectors' approach to assessments. In 2021, SCE held in-person field training for all lead HTMP QC arborists to drive consistency when using the Tree Risk Calculator to assess potential hazard trees. SCE plans to continue this type of field training in 2022 and beyond. Additionally, as Cal Advocates acknowledges, "SCE…indicates that it is working to consolidate its various vegetation management tools into an integrated vegetation management platform, which will allow cross referencing between its various vegetation management databases. This is a positive development that will allow SCE, Energy Safety, and stakeholder parties to better understand the efficacy of SCE's vegetation management programs."[14]

Cal Advocates argues that there could be important safety risks created by the "lack of consistency in SCE's HTMP inspections" pointing to the fact that two ignitions and 25 tree-caused circuit interruptions (TCCIs) occurred in 2021 on circuits previously inspected by the HTMP program. As Cal Advocates mentions, SCE is working on an integrated data management system that will assist SCE in analyzing correlations between TCCIs and specific trees assessed in the HTMP program, but at present that connection cannot be made. It should not be assumed, therefore, that these events represent some failure in the HTMP program. Even where a specific tree has been

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[12] Cal Advocates Comments on 2022 WMP Updates, p. 36.
[13] The numbers stated in Cal Advocates' 2022 WMP Comments are based on SCE's initial response to CalAdvocates-SCE-2022WMP-07, dated March 15, 2022. SCE submitted a supplemental response to this data request on April 15, 2022, which corrects the data provided in the initial response.
[14] Cal Advocates Comments on 2022 WMP Updates, p. 39.

assessed, HTMP assessments are performed at a moment in time, based on observable conditions. It is not possible to account for latent tree defects or unforeseeable subsequent circumstances. Thus, while HTMP assessments can, and do, effectively mitigate significant risk that a tree will fail based on observable conditions, they cannot eliminate all fall-in or blow-in risk.[15] Further, Cal Advocates' comments fail to consider all of the events (ignitions or TCCIs) that likely have been prevented by the removal of trees identified through the HTMP program. Though it is impossible to prove that negative, overall, SCE has seen a downward trend in TCCIs for circuits that have undergone HTMP assessments.

For these reasons, SCE disagrees with Cal Advocates' argument that a concerning non-conformance rate exists in the HTMP program that must be redressed in the next three-year WMP cycle.

B. SCE Disagrees with Cal Advocates' Recommendation that SCE Re-evaluate and Justify Its Quality Control Staffing Decisions (Contractors as Compared to In-House Resources) in the 2023 WMP

Cal Advocates requests that for future WMP filings, Energy Safety require SCE to "clearly [explain] which VM programs use contractors versus in-house staff, along with SCE's reasoning for current staffing decisions."[16] Cal Advocates adds that SCE should report the proportion of in-house labor to contractors and the justification behind these staffing decisions. Finally, Cal Advocates recommends that SCE study whether the current structure of its QC program is sufficient.[17]

With respect to the proportion of in-house labor to contractors in vegetation management, SCE has addressed this topic in Section 5.4.1 and 5.4.2 of the 2022 WMP Update, consistent with Energy Safety's 2022 WMP Guidelines. SCE also provides details about the qualifications required of its contractors in these sections. Cal Advocates offers no specific justification as to why additional detail about resource decisions is necessary.

Cal Advocates' second recommendation, that SCE should study whether the structure of the QC program is providing sufficient oversight, is based on a misunderstanding of SCE's data request response concerning its Dead and Dying Tree Removal Program (DDTP).[18] In the referenced data request response, SCE explained that in early 2021, SCE did not have a formal QC program for its DDTP. However, one of the DDTP

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[15] In 2022, SCE is incorporating additional HTMP inspections as part of its supplemental inspections in Areas of Concern (AOC). As part of this effort, the HTMP assessors will re-inspect portions of circuits in AOCs with subject trees that meet certain criteria. SCE is also considering making a second pass of the HTMP circuits previously inspected once the current HTMP plan is complete. This second pass effort is still in the planning stages and will be informed by the remaining HTMP inspections, including those in AOCs.

[16] Cal Advocates Comments on 2022 WMP Updates, p. 40.

[17] *Id.* at p. 42.

[18] Data Request Set CalAdvocates-SCE-2022WMP-11, Question 1.

contractors performed some of their own QC assessments in house and reported incomplete data to SCE concerning 87 non-conformances they identified. This limited example is not indicative of contractors being generally incapable of doing QC. It merely demonstrates the difference between an ad-hoc, non-independent QC program run by a contractor performing the actual tree removals, and an independent, robustly designed QC program performed by qualified QC personnel, the latter of which SCE developed and implemented in Q3 2021. Under SCE's program, contractors are still used to perform QC assessments, but they are independent of the DDTP contractors and their work is directed by SCE. Cal Advocates has not presented any reason to conclude that SCE's formal QC program is providing insufficient oversight.

In short, SCE agrees that it is important to staff its wildfire mitigation efforts with qualified resources. However, justifying the division of labor between contract staff and SCE internal resources is not necessary to demonstrate a robust and effective wildfire mitigation strategy. Cal Advocates provides no data to support that employing a higher ratio of in-house staff to contractors would have a positive or negative effect on the efficacy of the vegetation management mitigation programs.

IV. ASSET MANAGEMENT & INSPECTIONS

A. SCE Does Not Agree with Cal Advocates' Characterization of the Status of SCE's Maintenance Tags

Cal Advocates recommends that "Energy Safety should direct SCE to immediately fix its overdue maintenance and develop a plan for resolving future overdue maintenance."[19] Cal Advocates states that SCE's backlog of maintenance tags is substantial and that they can lead to serious safety hazards.[20] SCE disagrees with this characterization and notes that overdue notifications need to be understood within the appropriate context. First, past due notifications were not necessarily a significant source of ignitions. Second, SCE seeks to locate and remediate the riskiest open notifications on the highest risk structures prior to peak high fire season. Third, the majority of past due notifications within both distribution and transmission are outside of SCE's control.

1. Past due notifications were not necessarily a significant source of ignitions in 2021.

Cal Advocates argues that unresolved maintenance can lead to serious safety issues, pointing to 99 CPUC-reportable ignitions linked to assets with pending maintenance tags.[21] This argument incorrectly assumes a causal link between the existence of an open notification and an ignition. In fact, the causes of those ignitions were varied, such

[19] Cal Advocates Comments on 2022 WMP Updates, at p. 31.
[20] *Id.* at 34.
[21] *Id.*

as contact from object or vandalism, which have nothing to do with the pending maintenance tag.

As stated within SCE's 2022 WMP Update,[22] in April 2019, SCE launched the Fire Incident Preliminary Analysis (FIPA) process to perform more in-depth investigations into all ignitions that occur in connection with SCE facilities. SCE notes that the FIPA process evaluates the root cause of all ignitions associated with SCE infrastructure and which includes three levels of investigation. Depending on the complexity of the ignitions, the three levels include, Level 1 (may review pictures, interviews and repair orders), Level 2 (in addition to Level 1, may include site visits and fault analysis) and Level 3 (in addition to Level 2, may include evaluation by a root cause engineer). Moving forward, the FIPA process will examine if there is a connection between the cause of an ignition and an open notification (maintenance tag).

2. SCE mitigates the chances of catastrophic wildfires resulting from an overdue maintenance tag.

Through its risk-informed inspection and remediation process, SCE is able to reduce the chances of a catastrophic wildfire resulting from an overdue maintenance tag. SCE inspects its highest risk structures more frequently, and any resulting notifications are prioritized based on the estimated severity and impact. Priority 1 (P1) notifications are completed or made safe within 72 hours for HFRA or non-HFRA. P1s are unplanned activities, also referred to as breakdown maintenance, and include the repair of SCE equipment and structures that are severely damaged, compromised or have failed in service. Priority 2 (P2) notifications are lower risk and therefore may be resolved within six months for Tier 3 or 12 months for Tier 2 within HFRA. Examples of P2 issues include nearby vegetation, deteriorated crossarms or insufficient pole depth. Although notifications identified via inspections may become overdue, they may not necessarily pose an ignition risk (e.g., road deterioration, missing pole steps or unauthorized customer or communication company attachments).

In addition to our risk-informed inspections, SCE also looks at the highest risk structures within a dry fuel area through our Areas of Concern (AOCs) program. Within AOCs, SCE expects high vegetation growth and should a spark occur, an adverse fire could result. Notifications identified within AOCs are placed on a timeline as specified above with the highest risk notifications accelerated to be completed before those notifications would pose their greatest risk. To identify the highest risk notifications, a risk ranking methodology is utilized for AOCs, made up of four core dimensions which include pending work on structures, time function, probability of ignition and Technosylva consequence score.

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[22] SCE 2022 WMP Update at p. 472.

Notifications identified on our highest risk structures are monitored on an annual basis via risk informed and AOCs inspections and should additional deterioration be identified; the notification priority will be escalated. For example, should a weathered crossarm P2 be identified the first year and during a subsequent inspection the second year it is found to have deteriorated to the point of breakage, an emergency P1 notification would then be generated and the crossarm would be addressed within the P1 timeframe. Since 2019, there have only been 300 distribution notifications that were converted from P2 to P1 based on updated field conditions.[23]

Furthermore, the areas with the highest dry fuel risk are patrolled prior to peak high fire season as part of the AOCs program. As stated in the SCE 2022 WMP update,[24] patrols consist of a slow vehicle-based (where possible) patrol which looks for P1 conditions, mid-span clearance conditions (e.g., vegetation in lines or potential wire slap) and Communication Infrastructure Provider (CIP)/third party hazardous conditions.

Accordingly, SCE seeks to locate and remediate the riskiest open notifications on the highest risk structures prior to peak high fire season.

3. The majority of past due notifications are outside of SCE's control.

Cal Advocates recommends that SCE develop a plan for addressing past due notifications with the goal of resolving them by 2022.[25] However, the majority are outside of SCE's control. For distribution facilities, there are currently 2,419 past due P2 notifications in SCE's high-fire risk area. Approximately two-thirds are the result of GO 95 exceptions (e.g., delays obtaining permits or environmental clearance issues) that are outside of SCE's control. For transmission facilities, there are 3,217 (1,765 electrical, 1,452 right-of-way) past due notifications in a high-fire area. 84% are the result of constraints that are outside of SCE's control. In situations where SCE has determined a past due P2 has deteriorated to the point where it needs immediate attention, SCE will remediate it with an emergency P1 notification to correct the issue within the required timeframe without the normally required permits or clearances.

B. Additional Reporting on Past Due Notifications Is Not Necessary

Cal Advocates states "Energy Safety should require SCE to immediately develop a plan for resolving its overdue maintenance backlog in a timely, risk-informed manner, …

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[23] For context, SCE has had approximately 180,000 distribution P2 notifications during this same time period.
[24] SCE 2022 WMP Update at p. 366.
[25] Cal Advocates Comments on 2022 WMP Updates, at p. 34.

Energy Safety should require quarterly reporting on open maintenance notifications of all IOUs, not just PG&E, … and, Energy Safety should require SCE to submit a plan in its 2023 WMP to prevent the recurrence of an overdue maintenance tag backlog."[26] As described above, SCE is completing open maintenance tags as expeditiously as possible. Additional reporting and administrative requirements will not help past due notifications to be remediated any faster. Finally, as stated above, there are factors outside of SCE's control that can constrain our ability to remediate pending notifications.

C. SCE Generally Is Aligned with Cal Advocates' Recommendation Regarding a Drone Inspection Working Group but Would Like to Further Understand Potential Requirements

Cal Advocates recommends that "Energy Safety should convene a technical working group to examine the effectiveness of drone inspections across the three large IOUs."[27] "For the technical working group, Energy Safety should require each utility to submit a separate report that analyzes the potential applications of drone inspections, addressing the effectiveness and limitations of each application."[28] SCE generally supports this recommendation because there is likely a public safety benefit to continuing to improve upon drone inspections. SCE has previously met with PG&E and SDG&E to discuss the status of drone and other aerial inspections, best practices and any lessons learned. Prior to establishing a new report requirement, a working group should evaluate the benefit of such report and its contents and consider how to narrow its focus as much as possible so as to minimize the administrative burden focus the efforts of all parties involved on evaluating the effectiveness of drone inspections.

D. Cal Advocates' Recommendation that Energy Safety Order SCE to Identify C-hooks Outside of the HFTD Is Outside the Scope of the WMP

Cal Advocates repeats its argument from the 2021 WMP Update process that Energy Safety should order SCE to identify C-hooks during transmission inspections that reside outside the HFTD.[29] Energy Safety rejected the portion of Cal Advocates' recommendation outside the HFTD and instead ordered SCE to perform inspections of its *HFTD territory* to identify all C-hooks in HFTD zones or explain how SCE has already inventoried C-hooks.[30] As explained in Section 7.3.3.15.1.1 of its 2022 WMP Update, SCE was able to inventory C-hooks in HFTD due to its aerial inspection efforts to

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[26] *Id.* at pp. 4-5.
[27] Cal Advocates Comments on General Issues in the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities General Issues ("Cal Advocates Comments on General Issues") at p. 9.
[28] *Id.* at p. 12.
[29] Cal Advocates Comments on 2022 WMP Updates at pp. 35-36.
[30] Energy Safety Final Action Statement on SCE's 2021 WMP Update, pp. 63-64 (emphasis added).

capture images of all transmission structures in HFTD. This effort allowed inspectors as well as SCE engineers to inventory C-hooks in the HFTD and identify locations to proactively replace them, which SCE is doing (see SCE mitigation initiative SH-13). Placing requirements that are outside the HFTD and not a wildfire risk is outside the scope of the WMP and should be rejected. Notwithstanding this, SCE understands the concern that an aging C-hook could potentially cause adverse safety outcomes should it become defective. In light of this concern, SCE will explore cost-effective methods to identify and replace C-hooks outside the HFTD.

V. GRID DESIGN & SYSTEM HARDENING

A. Fast Curve (FC) Settings

1. SCE agrees with MGRA recommendations on gathering more analysis related to outages but seeks additional clarification related to potential future WMP reporting requirements related to FC settings.

MGRA recommends that "Energy Safety should require that all outages resulting for aggressive circuit breaker settings be logged either with a field in the outage table or as a separate GIS data set."[31]

SCE, in general, supports increasing the capture of data to improve analysis of outages. SCE can presently track outages when FC settings are enabled. However, SCE is unclear as to what constitutes "aggressive" circuit breaker settings, what an "outage table" is, and how and in what context this additional data, when defined, would apply to a "GIS data set." Additionally, outages may occur whether FC settings or traditional settings operate the recloser or circuit breaker, so directly correlating outages to FC settings is often challenging. FC settings work by de-energizing the line quicker during elevated fire conditions before more fault energy develops. Therefore, SCE believes further discussion and clarification is needed to understand if and how SCE could obtain this data, and how it could be reported in a meaningful manner in the future.

MGRA also recommends, "Utilities should be required to determine whether the additional outages detected when EPSS or Fast Trip settings are in place provide any additional information regarding circuit vulnerabilities to extreme weather conditions or the state of circuit health."[32] Similar to MGRA's recommendations above, SCE is unclear as to MGRA's specific recommendation, and therefore believes additional discussion and clarification is necessary in order to determine the feasibility and meaningfulness of the recommendation. In concept, using historical fault and outage

[31] MGRA Comments at p. 67.
[32] *Id.*

information aligns with SCE's approach of leveraging data on potential vulnerabilities to best understand mitigation options. SCE's practices following an outage from FC are to perform circuit patrol in search of the cause, while also determining when it's appropriate to re-energize. Additional information collected for the cause of the outage is recorded in SCE's outage tracking systems. This information on outages is used as an input into prioritization for many of SCE's WMP activities.

B. Undergrounding / Covered Conductor

1. MGRA's recommendation to carefully consider effectiveness of alternatives before a major roll-out of undergrounding requires clarification.

MGRA recommends that, "Energy Safety should recommend against any major roll-out of undergrounding as a long-term solution until questions regarding effectiveness of alternatives such as covered conductor and REFCL have been evaluated, and proper risk/benefit of other alternatives such as PSPS and EPSS have been incorporated as well."[33] It is unclear what MGRA deems as sufficient consideration or at what level of undergrounding they would suggest further review. Given its mitigation effectiveness and the relative lower cost and faster speed of deployment when compared to alternatives such as undergrounding, SCE has historically chosen covered conductor as a significant part of its overall wildfire mitigation strategy. However, as described in Section 7.1.2.1, SCE's Integrated Grid Hardening Strategy uses a risk-prioritization methodology that deploys mitigations, or combinations of mitigations, in the riskiest parts of its service area, including covered conductor, CC++,[34] undergrounding, REFCL++,[35] and CC/REFCL++.[36] While SCE recognizes the effectiveness of covered conductor and the potential additive effectiveness of REFCL,[37] SCE also recognizes that some particularly risky areas call for undergrounding and undue delay in hardening them is imprudent.[38] As such, SCE is carefully planning future undergrounding efforts and has 31 miles scoped for undergrounding in 2022 and 2023.

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[33] *Id.* at p. 76.
[34] Installing covered conductor combined with fire-resistant poles installation, asset inspections, FC settings for CB relays, along with vegetation management activities (as necessary) including HTMP, pole brushing, and line clearing.
[35] Installing REFCL combined with asset inspections, FC settings for CB relays, along with vegetation management activities (as necessary) including HTMP, pole brushing, and line clearing.
[36] Installing covered conductor and REFCL combined with fire-resistant poles installation, asset inspections, FC settings for CB relays, along with vegetation management activities (as necessary) including HTMP, pole brushing, and line clearing.
[37] SCE's REFCL implementation on the Acton and Phelan substations will take place in 2023. The learnings from that implementation will be incorporated in SCE's Integrated Grid Hardening Strategy and will further inform future scope.
[38] SCE 2022 WMP Update at p. 219.

2. MGRA's assertion that SCE prioritizes wildfire mitigation initiatives based on a utilities' rate of return or executive compensation is patently wrong and should be rejected.

MGRA states that "Energy Safety should investigate whether incentives to support and complete capital projects, particularly undergrounding, are part of utility compensation packages."[39] MGRA implies that utilities are incentivized to make wildfire mitigation capital expenditures by the compensation packages offered to their employees. SCE's wildfire mitigation programs are informed by reducing risks to the customers and communities we are privileged to serve; they are not driven by executive or non-executive employee compensation. As described in Section 7.1.2 of its 2022 WMP Update, SCE uses risk-informed decision-making when assessing and selecting wildfire and PSPS mitigations and prioritizing deployment for selected activities.

Broadly speaking, the process can be broken down into four major stages: First, we evaluate or reassess, and then prioritize, wildfire and PSPS risks. Second, we identify the choice of mitigations to address the risk. Third, we evaluate the mitigations and then select the appropriate one(s) from among the alternatives, using decision-making factors. Fourth, we prudently scope and deploy the chosen mitigation(s). We then continue to monitor deployments in light of relevant conditions or circumstances, and we strive to improve through lessons learned, metrics information, and feedback from our customers, regulators, and other stakeholders.

SCE's employees' variable compensation does to some extent depend on the avoidance of negative safety outcomes across the enterprise as well as the effective deployment of SCE's overall capital improvement plan and execution of certain specific capital programs such as covered conductor – that is intentional. The achievement of company goals related to safety and resiliency is beneficial to SCE's customers. In addition, for certain executive employees, compensation tied to positive safety outcomes is required by statute.[40] To the extent that both non-executive and executive employees' compensation is positively correlated with positive safety outcomes, and to the extent that wildfire mitigation expenditures contribute to risk reduction for customers, that is an appropriate result, and not a reasonable basis for criticism. In addition, it is noteworthy that the incentive compensation for SCE's executive officers is paid for by shareholders, not customers.

MGRA also wrongly asserts that utilities do not have an incentive to rank circuit mitigations in order of risk. Overall, the CPUC and Energy Safety currently expect the utilities to prioritize work pursuant to risk. SCE does so: As described in its 2022 WMP Update and since its first wildfire mitigation-specific application (GSRP), SCE's

[39] MGRA Comments at p. 99.
[40] Cal. Pub. Util. Code §8389(e)(4).

mitigations are risk-informed and it continues to improve its risk modeling capabilities as described in every WMP. In certain cases, operational considerations and economic-efficiency reasons reasonably lead to SCE employing mitigation measures on circuit segments in an order that does not perfectly align with the prioritization risk-buydown curve. But that is expected, authorized by the Commission,[41] and economically efficient for customers. For the reasons stated above, MGRA's rate of return and compensation recommendations are misplaced and should be dismissed.

3. SCE is generally supportive of co-trenching, but it is premature to adopt Cal Advocates' recommendation and added requirements for the 2023 WMP.

Per Cal Advocates, "Energy Safety should require electric utilities to develop plans to co-trench shared utilities, and to submit those plans in their 2023 WMPs."[42] SCE is cautiously supportive as there may be benefits to co-trenching. SCE notes, however, that it cannot require telecommunications companies to underground their overhead equipment and lines, and there are factors that could complicate co-trenching.[43] SCE works collaboratively with telecommunications companies, but there are many factors that all entities involved must consider when co-trenching, including cost, timing, operational preferences, resource constraints, etc. In some cases, telecommunications companies have historically not supported co-trenching when undergrounding for wildfire mitigation purposes. Therefore, Cal Advocates' recommendation for co-trenching should be evaluated further but should not be adopted until all stakeholders involved – electric utilities, telecommunications providers, the Commission, Energy Safety, and others – have collectively performed a robust evaluation of the feasibility, benefits, costs, constraints, etc. Any requirement for SCE to co-trench must be considered within the context of what utilities can and cannot control in the co-trenching process.

4. SCE is Benchmarking Covered Conductor Effectiveness as part of a Joint IOU Working Group.

MGRA recommends, "OEIS should immediately validate SCE's current data regarding outages, wires down, and ignitions, taking into account its pace of deployment, with an

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[41] *See, e.g.*, D.21-08-036 at p. 200, fn. 669.
[42] Cal Advocates Comments on General Issues at pp. 2, 7.
[43] SCE notes that General Order 128, Rule 17.4 – Joint Use of Excavations and Facilities – states: Joint trenching and installation of facilities may be undertaken subject to the clearances stated in these rules. Nothing herein shall be construed as requiring joint trenching or as granting authority for installation of facilities in a trench excavated by or for another party without consent of such party.

eye to seeing whether effectiveness rates on the order of 60-70% are reasonable or whether effectiveness should be ranked much higher."[44] MGRA's request should be denied as discussed below.

Mitigation effectiveness rates are one of the topics being benchmarked by several utilities[45] in the Joint IOU Covered Conductor Effectiveness Working Group. The outcome of this effort is intended to produce (and update over time) a consistent understanding of the effectiveness of covered conductor, in comparison with alternatives to mitigate wildfire risk at the driver level and to reduce PSPS impacts. The report on covered conductor effectiveness includes the utilities' estimated and recorded data (where available) on covered conductor effectiveness and explains the steps the utilities plan to take to continually improve its data sets and effectiveness understanding. The report details how utilities have limited years of recorded data, given that covered conductor deployment has been in existence for only a few years. MGRA's assertion that utilities are "low-balling" [46] the effectiveness of covered conductor is misleading and should be rejected.

In asserting this, MGRA contrasts SCE's *vegetation-contact* estimate and SDG&E's and PG&E's *overall* effectiveness estimate to SCE's 2021 recorded fault data, wire downs and ignitions and PacifiCorp's effectiveness estimate for vegetation contact, vehicle contact, and equipment failure based on a pilot.[47] The utilities agree that covered conductor is effective at mitigating several drivers and early results have been positive, but MGRA's analysis is flawed and its recommendation should be rejected. The Joint IOU Covered Conductor Effectiveness Report provides substantial support for a current overall effectiveness of covered conductor between 60-70%. This is supported by benchmarking, the Phase 1 testing results, utility SMEs, and recorded results. Furthermore, the utilities will continue efforts in 2022 to improve their understanding of the effectiveness of covered conductor including through new testing, additional benchmarking, reviewing recorded results and further SME collaboration. Energy Safety should support the continued efforts of this working group and reject MGRA's recommendation to immediately validate SCE's 2021 recorded results and direct utilities to use a higher overall effectiveness value as a result.

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[44] MGRA Comments at p. 99.
[45] "Utilities" refers to SDG&E, Pacific Gas and Electric Company (PG&E), SCE, PacifiCorp, Bear Valley Electric Service, Inc. (BVES), and Liberty.
[46] MGRA Comments at p. 72.
[47] *Id.* at pp. 69-71.

C. Working Groups on Emerging Topics

1. SCE supports participating in working groups on emerging topics but caveats that some of these discussions are taking place in other forums and new working groups should only be added strategically for critical issues, not duplicative of existing efforts, and where SME resource capacity is available.

MGRA states, "Stakeholders should be provided periodic review and input into utility-centric OEIS working groups so that they are kept apprised of status and have the ability to ask questions."[48] MGRA further recommends that, "OEIS should begin a REFCL working group with a goal of identifying design configurations that would be most appropriate for California utilities, expanding potential pilot sites and goals, and identifying and solving potential problems and pitfalls. OEIS and SCE should lead this group. The group should present bi-annually to stakeholders regarding progress."[49] Cal Advocates recommends that "Energy Safety should expand the existing collaboration on system hardening methods for more than just Covered Conductor."[50] Cal Advocates also recommends, among other working groups, "Energy Safety should convene the utilities in summer to consider Undergrounding practices. Utilities should submit a report with their 2023 WMPs."[51] SCE supports expanding existing collaboration, provided that new working groups are strategic, with clear purpose and outcome, not duplicative of existing efforts, and where subject matter expert availability is not constrained.

In several instances, SCE is already collaborating with other utilities on the stakeholders' recommended subject areas. For example, SCE has meetings on REFCL with PG&E and SDG&E, and with Powercor and AusNet Services in Australia. These meetings provide a forum to discuss best practices, advancements, and status of each utility's efforts related to REFCL. SCE also meets with PG&E and SDG&E every two-to-three weeks to discuss status of undergrounding work, and to share best practices and lessons learned (e.g., SCE has shared its Severe Risk Area Methodology with PG&E and SDG&E). The utilities will continue to hold these meetings and will incorporate findings into future program strategies. Many of the SMEs involved in the existing working groups (e.g., covered conductor effectiveness working group) most likely would also be key stakeholders in any newly formed working groups (e.g., recommended undergrounding working group). Any new working group needs to be carefully balanced so as not to spread already stretched thin resources even further.

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[48] *Id.* at p. 72.
[49] *Id.* at pp. 99-100.
[50] Cal Advocates Comments on General Issues at pp. 2, 6.
[51] *Id.* at pp. 2, 6.

VI. PUBLIC SAFETY POWER SHUTOFFS

A. Energy Should not Adopt Cal Advocates' Recommendation that SCE Should Be Required to Report on Year-over-year Improvements in Its Weather Forecasting Capabilities, Including Performance of New Machine Learning Models

Although SCE continues to make enhancements to its situational awareness capabilities and weather forecasting models, SCE disagrees with Cal Advocates' assertion that "SCE's forecasting performance in 2021 was poor, which led to tens of thousands of missed notifications and PSPS event scope changes immediately before de-energization."[52] SCE strives to provide advance notice to customers in accordance with the timeframes adopted by the Commission. However, during SCE's November 24, 2021 PSPS event highlighted by Cal Advocates in its comments,[53] the rapidly escalating weather conditions (including highest ever recorded windspeeds in several locations) unfortunately necessitated de-energization of many customers without prior notification. Cal Advocates incorrectly attributes missed advance notifications to "forecasting errors" on the part of SCE.[54] It is not scientifically possible at this time to precisely pinpoint the exact location and magnitude of damaging winds at 24-72 hours, or in some cases even at 1-4 hours, before a de-energization decision is made. Even though SCE runs multiple sophisticated weather models, no forecast is perfect due to limitations in the science of numerical weather prediction.[55] These limitations are *not* specific to SCE. Weather is subject to unpredictable, sudden changes, and even with the best intent and technology, it is not always possible to stay ahead of all those changes and identify in advance every potentially impacted circuit.[56]

The Commission has recognized the impact of weather forecasting and other limitations on the IOUs' ability to provide advance notifications. *See, for example*, D.19-05-042 in R.18-12-005, pp. 86, A7-A8 ("Recognizing that there may be times when advance notice is not possible due to emergency conditions beyond the electric investor-owned utilities' control, the electric investor-owned utilities must, whenever possible, provide advance notification"; "Electric investor-owned utilities should, whenever possible, adhere to the [] minimum notification timeline . . ."); *see also* Commission Resolution ESRB-8, p. 5 ("We recognize that it is not practicable to have an absolute requirement

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[52] *Id.* at p. 19, n.69.
[53] *Id.* at p. 20.
[54] *Id.*
[55] SCE uses state-of-the-art modelling technology calibrated to realized weather conditions and terrain in its service territory. SCE's modeling suite includes 18 high-resolution dynamic weather models downscaled to 1- or 2-km resolution using multiple initial sources to account for forecast uncertainties. Additionally, SCE relies on machine learning models to continuously improve forecast accuracy through forecast bias correction and will increase the number of machine learning model locations in 2022 and 2023.
[56] Note that SCE makes actual de-energization decisions based on real-time windspeeds, rather than its weather forecasts.

that electric IOUs provide advance notification to customers prior to a de-energization event.").

Cal Advocates' recommendation to report "year-over-year improvements" in SCE's weather models' accuracy is also misguided because each year is subject to its own weather conditions, with some fire seasons being more severe than others, and thus the proposed comparison is not an appropriate method to gauge improvement in weather forecasting. Comparing the metrics of weather models from one year to another may give a false impression of improvement or lack thereof, depending on the severity of weather conditions in a given year. It is more productive to compare the performance of newly built models to existing ones for the current year, which is how SCE measures improvement. Moreover, Cal Advocates did not demonstrate the need for additional, overly-prescriptive reporting guidelines on this subject. SCE already includes throughout the WMP information addressing enhancements in weather modeling.[57]

In sum, SCE's "forecasting performance" in 2021 was neither "poor," nor the cause of missed PSPS notifications (which, as SCE previously reported, were primarily attributable to unpredictable, rapidly escalating weather conditions and the limitations imposed by SCE's legacy manual processes for generating notifications). SCE understands the importance of providing its customers, the Commission, and other stakeholders with timely and accurate information regarding PSPS events. To this end, SCE is prioritizing improvement of its PSPS notification capabilities with the implementation of the PSPS IMT Process Automation and Customer Notifications Project in 2022.

VII. DATA GOVERNANCE AND RELATED RECOMMENDATIONS

A. SCE Does Not Agree with the Green Power Institute's (GPI) Recommendation to Perform and Describe the Outcome of Sensitivity Analyses for Planning Models and RSEs

GPI recommends that, "SCE plan and perform sensitivity analyses on planning models and RSE values in their next 3-year WMP plan. All IOUs should be required to describe the outcomes of their sensitivity analysis."[58] SCE appreciates these comments however they must be viewed within the context of the larger overall risk framework that the Commission, through the Risk OIR and Energy Safety, through its risk modeling working group sessions, are evaluating.

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[57] *See* Section 7.3.2.6.1 Weather and Fuels Modeling (SA-3) of SCE's 2022 WMP Update, pp. 283-285. SCE also discussed under Lessons Learned (p. 30) the importance of taking the time necessary to properly evaluate weather modeling enhancements (such as equipping additional weather station locations with ML capabilities) before operationalization. SCE will provide the results of its periodic evaluation of weather models upon completion of the review process. However, this information may not be available for inclusion in every annual WMP filing.

[58] GPI Comments at p. 7.

B. SCE Generally Agrees with GPI's Recommendation to Provide "Goodness of Fit" Metrics for Machine Learning Models

GPI recommends, "WMPs should be required to include model fit metrics for all utility-developed models used in risk-based decision making."[59] SCE uses various "goodness of fit" metrics depending on the model type and the focus for the model. As an example, our image algorithms for condition detections utilize precision and recall metrics for validating the accuracy of the models. For other advanced analytics algorithms we also look at mean accuracy percentage, confusion matrix results, KS Statistics, Receiver Operator Characteristics (ROC) and Area under the Curve (AOC) as the most commonly used metrics.

C. SCE Is Generally Aligned with GPI's Recommendation for IOUs to Improve Data Transparency

GPI recommends, "exploring the need to establish data update frequency standards for risk modelling inputs such as vegetation and population data sets."[60] "IOUs should be required to improve equivocal language used in describing data uncertainty and data validation/verification methods. The new 3-year WMP cycle should advance these methods to provide more statistically robust data validation/verification plans that can reduce input data error and therefore improve model uncertainty."[61] SCE is building a centralized wildfire data repository with an external portal to manage and share the data related to various wildfire mitigation initiatives, with data quality control processes. This solution will provide more visibility on the data utilization in wildfire mitigation, the frequency of data publishing and direct access to authorized external parties.

D. SCE Does Not Agree with GPI's Recommendation to Produce a 10-year Outlook Within the Next 3-year WMP Cycle

GPI recommends, "requiring a 10-year operations and maintenance as well as capital cost outlook in the next 3-year WMP cycle in order to better evaluate how IOU strategies for near and mid-term wildfire planning may affect long-term cost effectiveness and possible cost reduction."[62] SCE does not agree with this recommendation and believes this information – where available – would not be meaningful or relevant to the WMP process. First, SCE does not develop a 10-year capital and O&M forecast for each WMP activity. Detailed forecasts at the mitigation

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[59] *Id.* at p. 6.
[60] *Id.* at p. 8.
[61] *Id.* at p. 10.
[62] *Id.* at p. 2.

category level were included as part of SCE's 2022 WMP update for 2022 and 2023. SCE's next WMP is anticipated to include forecasts for the 2023-2025 period. Further, SCE will be submitting its 2025 General Rate Case in May of 2023, which will provide SCE's forecast for work covering the 2025-2028 period, which is the appropriate forum to discuss those medium-term forecasts. SCE notes that the WMP is not a proceeding in which cost recovery is authorized, and that the level of financial information currently provided as part of the annual filing is sufficient to review utility WMPs.

E. SCE Generally Agrees with GPI's Recommendations to Review Historical Fire Events and Develop Updated HFTD Maps

GPI recommends, "Future WMPs should include internal references to planned mitigation activities that would prevent or reduce the risk of past wildfire ignition sources as well as the quantified annual risk mitigation relative to baseline conditions in the year the fire occurred."[63] SCE reviews historical ignitions throughout SCE's service territory including the know causes of these ignitions. Our mitigation strategy is informed by this analysis of historical risk events and drivers, as well as the effectiveness of various mitigations in addressing those drivers.

GPI recommends, "An assessment of IOU's current HFTD buffer zone distances and activities is needed to establish best practices that enable preemptive wildfire risk mitigation versus the current model of reactive mitigations."[64] SCE appreciates this comment and is actively engaged in a process to review the current boundaries of SCE's HFRA. We are working with CAL FIRE, as well as our vendors to identify areas in which it may be prudent to both add and remove from the CPUC's current HFTD.

F. MGRA's Contention that SCE's Risk Data Should Be Public Is Misguided

MGRA misrepresents SCE's confidential treatment of detailed risk information tied to asset information and argues that wildfire risk data should be public.[65] Notwithstanding the fact that MGRA continues to refuse to enter into a non-disclosure agreement, their assertions are misguided. As explained in SCE's response to data request set MGRA-SCE-002, Question 03, the requested GIS shapefile includes granular consequence and asset information. This data thus ties detailed risk information to detailed asset information and provides information on where ignitions on SCE's assets could potentially cause the most damage to the communities we serve and SCE's facilities. As such, MGRA's assertion that the consequence component has nothing whatsoever to do with utility infrastructure is misguided and should be rejected. Given the potential for

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[63] *Id.* at p. 3.
[64] *Id.* p. 6.
[65] MGRA Comments at pp. 61-63.

bad actors[66] to use this information to inflict maximum damage to not only to SCE's infrastructure, but to the communities SCE serves, SCE believes it is not prudent to make this information publicly available.

VIII. CONCLUSION

SCE appreciates the opportunity to submit its Reply to Public Comments and recommends Energy Safety approve SCE's 2022 WMP Update taking into consideration its comments herein. If you have any questions, or require additional information, please contact me at michael.backstrom@sce.com.

Sincerely,

//s//
Michael A. Backstrom
VP Regulatory Affairs
Southern California Edison

[66] *See*, for example, CAL FIRE's latest arson statistics that show an alarming increase in 2020 and 2021 arrests over previous years (https://www.fire.ca.gov/media/zu3a42z1/arson-stats-2022.pdf).