BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Wildfire Safety Division
California Public Utility Commission

COMMENTS OF THE GREEN POWER INSTITUTE ON DRAFT RESOLUTION WSD-020

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COMMENTS OF THE GREEN POWER INSTITUTE
ON DRAFT RESOLUTION WSD-019

Pursuant to instructions in the June 16, 2021, cover letter accompanying WSD-20 – 2021 Wildfire Mitigation Plan Update of Southern California Edison, the Green Power Institute, the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security (GPI), provides these *Comments of the Green Power Institute on Draft Resolution WSD-020*.

GPI generally supports the identified Critical Issues and associated remedies as well as additional issues/remedies established in Draft Resolution WSD-020 and the Attachment A Action Statement. As noted in our previous comments to Resolution WSD-019, there is still substantial work needed to vet and improve quantitative risk modeling and RSE valuation, as well as link these tools to initiative deployment in order to establish robust risk-based decision making within wildfire mitigation plans and efforts. Similar to WSD-019, Draft Resolution WSD-020 appropriately extends WMP refinements and expectations to SCE that are relevant to all utilities.

Procedural concerns

WSD-020 is slated for Commission ratification in mid-August following the present party comment period which ends on August 6th. GPI recognizes the challenge of reviewing all Utility WMPs while also allowing for adequate comment, reply and comment review timelines. However, it is notable that the November 1, 2021, Utility response deadline for remedying Critical Issues is only approximately 2½ months after the anticipated WSD-020 ratification date, and approximately 3 months following the issuance of Draft Resolution WSD-020. There are also varying lead times between the individual LSE WSD Resolutions and the November 1, 2021, Progress Report filing date. Given these relatively short timelines, and the use of other LSEs' efforts as a relative gauge of plans and progress, it would be prudent to consider how the differential in Resolution issuance date and short timelines prior to the November 1 progress reports may affect response quality

and progress towards remedying critical issues. The next annual WMP updates will be issued in early February, approximately 3 months following the November 1 progress reports. As the WMP process progresses through the end of 2021 and into early 2022, we look forward to reviewing how these timelines affect reporting quality and efficiency and exploring whether additional procedural adjustments might improve the efficiency of plan development reporting as the WMP process matures.

Risk modeling and transparent model vetting

GPI provided comments on WSD-019 noting our prior advocacy for comprehensive and transparent wildfire risk model vetting. Those same comments generally apply to WSD-020 and are partially restated and adapted here for posterity and efficiency, with adjustments as applicable to SCE and Draft Resolution WSD-020:

GPI's opening comments on the 2021 IOU WMP Updates identified the need for a robust and transparent risk model vetting process, summarized as "Risk Modeling and the risk of not getting it "right": Wildfire and ignition risk models require comprehensive and transparent vetting." While PG&E had the most egregious risk modeling errors, we advocated that all utility risk models must be subjected to a vetting process. The WMPs do not provide adequate quantitative risk model evaluation metrics and risk model results are foundational to selecting and efficiently deploying wildfire risk mitigation actions on a granular level. GPI therefore supports WSD-020 key areas for improvement regarding ignition sources in risk modeling (SCE-21-10) and wildfire risk modeling consistency (SCE-21-03), and HFTD prioritization for CC and undergrounding (SCE-21-04, SCE-21-05, SCE-21-06).

WSD-020 includes critical issues that are related and parallel to SCE-21-03 (and SDGE-03), including SCE-21-10: "Inadequate transparency in accounting for ignition sources in risk modeling and mitigation selection," and SCE-21-11: "Unclear how SCE's ignition models account for correlations in wind speeds, ignitions, and consequence." GPI supports the addition of SCE-21-10 and -11 as critical issues that are a subset of the umbrella issue

SCE-21-03 (and SDGE-03) regarding a need for wildfire risk model vetting and transparency.

In our comments on WSD-019 GPI expressed concerned that critical issue improvement may not go far enough towards requiring comprehensive and transparent model vetting that is required prior to moving towards a more standardized risk model. As noted in our comments on Draft Resolution WSD-019:

Developing a standardized risk model will take time and require substantial comparative efforts between existing models, utility (especially IOU) systems, and their available data. Time is at a premium in the WMP process such that targeted and efficient mitigation deployment must continue during the years over which standardized models are being developed and refined. To this end it will be necessary to establish the ability for each individual utility model to guide wildfire mitigation deployment through comprehensive and transparent model vetting analyses and reports. The results of model vetting reports are also required to understand the limitations and benefits of each individual model in order to determine which, if any, risk model methodology is preferred for granular wildfire risk prediction for each risk driver, and whether it can be appropriately applied to all IOUs, and possibly SMJUs. GPI therefore recommends that WSD-020 include an additional key improvement that requires all utilities to prepare a transparent and comprehensive model vetting analysis and report similar to that prepared by E3 for PG&E's risk model. This key improvement can be included as a remedy nested under SDGE-2, and can constitute a product of the mandated working group. GPI is concerned that simply requiring "increased transparency" via a working group is insufficient. It is warranted and reasonable to include this expectation for the working group at the outset, since vetting existing models is foundational to model selection, and in order to give each utility a head-start in preparing model vetting metrics and reports.

GPI also respectfully requests that the WSD-020 Attachment A Action Statement regarding stakeholder input on page 22 be updated to include GPI's contribution and 2021 WMP update opening comment recommendation that all Utility risk models should be subject to verification:

There should also be a coordinated approach to the utilities' risk modeling efforts, supported by a Energy Safety-led technical working group (Cal Advocates). The risk models should be subject to independent peer review and verification (MGRA, GPI).

Inspection program accounting for all Utilities

WSD-019 found issue with SDG&E's failure to include all inspection programs, including drone inspection efforts, in "Inspections-other" in the non-spatial data filings. The proposed remedy states:

> REMEDY: In future non-spatial data filings, SDG&E must provide a comprehensive accounting of the number of inspections performed in the HFTD across all inspection programs, and the number of findings by type from each inspection. Each inspection program which is performed in the HFTD must be represented as a line item, with associated findings (WSD-019, p. 49).

While SCE included more information on inspections completed for each inspection type as summarized in the WSD-020 action statement, the action statement recommends formally updating the WMP non-spatial inspection data table to include all inspection types (e.g. drone, LiDAR) as sub-categories of inspection, "Other" and/or add this reporting requirement to the language in the WMP guidelines template for inspections.

Comparison of spend and maturity score

WSD-020 Actions Statement highlights that:

- There are inconsistencies between maturity scores and spend in SCE's Vegetation Management and Inspections and Stakeholder Cooperation and Community Engagement categories.
  o As reported in February 2020 versus February 2021, SCE's Vegetation Management spend in HFTD areas over the total WMP cycle increased significantly (by 123%).47 However, SCE only projects a slight increase in maturity in this category with a current score of 2.8 and an end score of 3.0.
  o For Stakeholder Cooperation and Community Engagement, there is also an increase in HFTD spend (by 58%), but no projected increase in maturity (current and end scores of 2.6) and minimal growth from SCE's initial score of 2.2 in 2020 (WSD-020, p. 18).

GPI is not opposed to including these observations in the WSD-020 Resolution Action Statement. We do, however, note that there is likely not a direct correlation between capability maturity level and relative activity spending. For example, an increase in the area over which existing VM methods are applied could substantially increase spending while having no impact on the maturity or sophistication of VM capabilities. Increases in maturity capabilities may also not be linearly correlated with spending, since initial major advancements may cost more than incremental improvements on those advanced systems, or vice versa. Assessing cost of increasing the maturity of wildfire mitigation capabilities may require further cost recovery breakdown between implementing existing methods versus making and implementing improvements on those methods.

RSE method alignment requirements require additional guidance

WSD-020 Draft Resolution states "Each large investor-owned utility is at a different stage in using the S-MAP/RAMP methodology approved in D.18-12-014. Going forward, each is supposed to employ uniform processes and scoring methods to assess current risk and estimate risk reduction attributable to its proposed mitigations (Draft WSD-020, p. 38)." SCE-21-02 and parallel IOU Critical Issues provides some clarity in terms of establishing a working group to address RSE alignment. We note that our opening comments to the 2021 WMP Updates raised specific concerns regarding a lack of information on the risk mitigation outcomes of a range of VM methods and a need for additional transparency in order to adequately evaluate their application and efficacy. GPI remains concerned that there is not currently sufficient guidance regarding the specifics that are required for RSE and related risk reduction valuation methods and transparency "going forward." We anticipate that the working group development and plan will include more specifics on risk valuation transparency as well as RSE method alignment. However, GPI urges Energy Safety and the working group to establish clear goals and expectations regarding what is meant by "going forward" since risk reduction valuation method alignment (e.g. RSE) may extend beyond the 2022 Annual WMP update deadline.

Conclusions

Similar to WSD-019 (i.e. regarding SDGE), GPI generally supports WSD-020 for its capability to drive SCE's WMP towards substantial, and global improvements needed to increase IOU transparency, vetting and validation standards for foundational WMP planning tools, namely RSE and risk assessment models.

The GPI urges the Commission to adopt our analyses and recommendations.

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Respectfully Submitted,

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