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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 Reply Comments on the Office of Energy Infrastructure Safety's Draft 2022 Wildfire Mitigation Plan Update Guidelines

Dear 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), and in response to Comments provided by certain Parties, Southern California Edison Company (SCE) submits these Reply Comments.

INTRODUCTION

SCE appreciates the thoughtful Comments from Parties on Energy Safety's Draft Guidelines and related attachments. SCE provides the following Reply Comments in response to Comments from Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), the California Association of Small and Multi-Jurisdictional Utilities, and the joint comments from the Public Advocate's Office (Cal Advocates), Mussey Grade Road Alliance (MGRA), and The Utility Reform Network (TURN) (collectively, Joint Stakeholders).

THE WMP PROCESS MUST BE TIMELY, PROVIDE ADEQUATE TIME FOR THE PROVISION OF INFORMATION, AND MINIMIZE ADMINISTRATIVE BURDEN FOR ALL PARTICIPANTS

SCE appreciates Energy Safety's focus on establishing a procedural schedule that adheres to the three-month statutory deadline for reviewing and approving utility

WMPs.¹ Timely dispositioning of the WMP is important to allow for utilities to timely finalize wildfire mitigation activities, execute on those plans, and to allow for the broader safety certification process to progress in a timely manner. The Draft Guidelines establish a timeline that enables this to happen. SCE recommends that modifications made to the Draft Guidelines – if any – allow for the timely evaluation and deliberation of the WMP as intended by the statute.

Due to the abbreviated timeline to disposition WMPs, Energy Safety has set a deadline of three business days for WMP-related discovery responses from utilities. This is less than one-third the amount of time typically afforded to utilities in traditional regulatory proceedings before the CPUC. SCE endeavors to meet this deadline in responding to WMP-related data requests, to not introduce undue delay into the process and to provide Parties and Energy Safety with the information requested to inform their timely review of SCE's WMP. In some limited instances, whether due to the complexity or availability of the information requested, the availability of the subject matter experts to provide the information requested, or the volume or concurrence of data requests being propounded by stakeholders, SCE selectively requests minimal extensions to respond to specific data requests. This allows for those responses to be provided in an accurate, meaningful, and responsive manner. SCE contends extension requests are the exception and not common practice; it is in SCE's interest to provide responses to data requests as timely as possible. Therefore, the provision allowing utilities to seek an extension, where reasonable and justified, to respond to data requests, must remain an option in Energy Safety's Final Guidelines and be considered in good faith throughout the WMP discovery process. SCE commits to working with Energy Safety and Parties in those instances to minimize or eliminate any impacts resulting from such extension requests.

Finally, any modification to the Draft Guidelines should not introduce additional requirements, reports, filings, etc., that would increase the administrative burden on utilities, Energy Safety, or participating stakeholders. The WMP process and its requirements – which are already comprehensive and concentrated in a relatively short period of time – should not add further components that could strain the already resource constrained utilities, Energy Safety, and Parties alike, and potentially extend WMP deliberation beyond the statutory deadline. SCE recognizes the Draft Guidelines' approach to staggering utility submittal and review timelines is one way to levelize workload across all stakeholders. While this can be beneficial, it should not be accompanied by the introduction of additional administrative and procedural requirements or steps that could erode such benefits.

¹ See Public Utilities Code Section 8386.3(a): "The Wildfire Safety Division shall approve or deny each wildfire mitigation plan and update submitted by an electrical corporation within three months of its submission, unless the division makes a written determination, which shall include reasons supporting the determination, that the three-month deadline cannot be met."

SCE SUPPORTS FURTHER DELINEATION BETWEEN COMPREHENSIVE FILINGS AND UPDATE FILINGS

The Joint Stakeholders suggest that Energy Safety should issue guidance on when a utility is allowed to file a WMP update and develop guidelines for a streamlined update filing.² SCE agrees that this guidance would be helpful and would provide another way to increase the efficiency of the WMP process. SCE would welcome the opportunity to engage with Energy Safety, the Joint Stakeholders, and other utilities on ways in which this could be structured as the 2023-2025 WMP cycle approaches.

SCE SUPPORTS AVOIDING DUPLICATIVE REQUIREMENTS

The Joint Stakeholders identified various additional geospatial information and mapping requirements that were added to the WMP submission through the Draft Guidelines that could be better served being incorporated into utility Quarterly Data Reports or Energy Safety's GIS Reporting Standards. SCE agrees that including duplicative requirements in the WMP and the associated Quarterly Data Reports may "... only serve to increase the length of the WMPs without providing commensurate analytical benefit."³ SCE appreciates any efforts such as these to reduce the size and complexity of WMP submissions, and to rationalize the requirements thereof for the ease and benefit of all stakeholders.

CONCLUSION

SCE appreciates the opportunity to submit its Reply Comments. 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

² Comments of the Public Advocates Office, Mussey Grade Road Alliance, and The Utility Reform Network on the Draft 2022 Wildfire Mitigation Plan Update Guidelines, p. 14.

³ *Ibid*, pp. 15-16.