Gary Chen
Director
Safety & Infrastructure Policy

December 27, 2021

E-filed Docket # 2021-GIS-DRS

Stephen P. Lai
Data Manager, Data Analytics Division
Office of Energy Infrastructure Safety
715 P Street 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Comments on Draft GIS Data Reporting Standard Version 2.2

Dear Mr. Lai,

Southern California Edison Company (SCE) appreciates the revisions proposed by the Office of Energy Infrastructure Safety (Energy Safety) to its Geographic Information Systems Data Standard (GIS Data Standard) and the opportunity to provide comments. SCE provides the following comments regarding the December 17, 2021 Draft Version 2.2 release of the GIS Data Standard.

PROPOSED QUARTERLY DATA MEETINGS

SCE supports Energy Safety's proposal to establish quarterly data meetings to strengthen collaboration and feedback mechanisms between Energy Safety and the electrical corporations. SCE has previously proposed data working groups to continuously refine and implement the GIS Data Standard.[1] However, Energy Safety proposes a quarterly cadence with meetings occurring Tuesdays during the third week in the first month of each quarter. Instead of a quarterly meeting cadence approximately two weeks prior to the Quarterly Reports submission due date, SCE proposes these quarterly meetings be scheduled approximately two to three weeks after submission of the Quarterly Reports. Leading up to the Quarterly Report submissions, SCE teams are collecting and transforming data, conducting quality assurance / quality control of the data, and developing the narrative for the massive amount of data and information included in the Quarterly Reports. Quarterly meetings approximately two to three weeks after Quarterly Report submissions would improve SCE's ability to prepare for and provide quality updates and feedback at the meetings.

ENERGY SAFETY SHOULD ALLOW SUFFICIENT TIME TO INCORPORATE THE NEW VEGETATION MANAGEMENT REQUIREMENTS

The proposed revisions require utilities to include (except for palms) the 1) genus of vegetation, 2) species of vegetation, and 3) common name of vegetation for Vegetation

[1] *See*, for example, SCE's August 26, 2020 Comments on Wildfire Safety Division's August 11-12, 2020 Workshop Presentations and Associated Staff Proposals.

Management Project Point, Vegetation Management Inspection Point, Transmission Vegetation Caused Unplanned Outage, Distribution Vegetation Caused Unplanned Outage, Major Woody Stem Exempt Tree Point, and Ignition Point Feature Classes.[2] SCE has recently incorporated these requirements in its vegetation management practices; however, SCE's systems and business processes require time to make these changes. Given a vegetation management tree inventory of over one million tree records SCE maintains, we have informed Energy Safety that we plan to incorporate these requirements by the end of 2022. As such, each quarterly report submission for 2022 will have incremental vegetation management records but a full dataset of these requirements is not expected until the submission of the Q4 2022 quarterly report. SCE recommends Energy Safety note that new GIS Data Standard requirements may not be able to be implemented in a short period of time but that continued improvements in meeting the GIS Data Standard are expected with each quarterly submission.

PROGRESS ON INITIATIVE TARGETS REPORTED IN THE QIU AND QUARTERLY NOTIFICATION SHOULD CONTINUE TO BE BASED ON BEST AVAILABLE INFORMATION AND NOT BASED SOLELY ON GEOSPATIAL DATA

The proposed revisions would require wildfire initiative target units reported in the Quarterly Initiative Update (QIU) and WMP to match the geometry of the data included in the geodatabase.[3] Energy Safety should remove this requirement because it would underreport actual progress of wildfire initiatives.

SCE reports its quarterly wildfire initiative target progress through its QIU and Quarterly Notification which, for good reason, may not align with the geometry in its geodatabase submission. SCE has a dedicated team that tracks performance of its wildfire initiatives. Given the complexities of SCE's systems, performance management reporting is not as simple as "a click of the button". Rather, the process to report progress on wildfire initiatives as accurately as possible includes compiling various system reports, meetings with initiative owners and business and information technology SMEs to discuss system information and initiative tracking information, conducting quality control reviews of this information, and processing performance management reports. At the end of each month, this process usually takes 2-4 weeks to complete.

The data included in the GIS Data Standard submission must meet specific criteria for inclusion, including, but not limited to, the ability to transform data from SCE's systems into Energy Safety's data architecture and display these data in a spatial format. As previously explained to Energy Safety, SCE is in process of transitioning our asset management system architecture to a cloud, platform-centric architecture that federates data from disparate enterprise systems. Currently, wildfire initiative work is stored across various internal source systems, each of which has unique data architectures and business processes that were established for operational purposes, which result in significant reporting complexities. In order for SCE to submit its geodatabase by the first of the month following the end of each quarter, SCE has to complete its compilation of initiative data by the first week of the month following the end of the quarter, which

[2] GIS Data Standard at p. 10-11.
[3] GIS Data Standard at p. 98.

leaves very little time to quality check the data on the front end prior to transforming the data into the required geodatabase architecture.

The timing difference between SCEs performance management reporting and the construction of the geodatabase, described above, is just one of several reasons Energy Safety should remove this requirement. Another reporting complexity is the lag between when work is completed in the field and when SCE's geospatial systems are updated. Work order packages take time to process, close out, and update geospatial records. Geospatial records are updated after the work order is closed out. Work order completion can take up to 60 days or longer for certain work after the work is completed in the field. While SCE teams that project manage wildfire initiative work obtain regular updates on completion of field work, geospatial data cannot be updated as quickly. Geospatial records need to account for final construction maps that can include changes in the field. The approximate miles or units completed, on the other hand, can be obtained with regular field updates, initiative owner and SME meetings, and quality control reviews, which, collectively, provide a more accurate progress status against wildfire initiative targets in contrast to geospatial data.

As an example to illustrate the complexities described above, SCE reports in its QIU covered conductor that is in-service. However, that will not match what is in the geodatabase because updates in the field are not instantly mapped. For covered conductor, as SCE's crews install and energize it, they send to SCE's circuit mapping team updated circuit maps, which are then used to update SCE's systems of record. However, those circuit maps do not contain the level of detail required by OEIS or, ultimately, SCE. Instead, they are used to update SCE's connectivity model, which only tracks structures with a transformer or switch and is not meant for precision measurements such as latitude and longitude of every pole in a circuit segment. These more granular details can only be mapped completely after a work order is closed. This process of submission, closure, and mapping takes months. As such, what is mapped in the geodatabase will lag the covered conductor in-service date. These timing differences are expected to persist. Accordingly, requiring utilities to report its wildfire initiative progress based on the geometry in the geodatabase would underreport actual progress and should be removed.

CONFIDENTIALITY SHOULD BE DETERMINED AT THE FEATURE CLASS LEVEL

The proposed revisions would allow utilities to indicate if an entire feature class or table is considered confidential but still require each specific field in the geodatabase to be marked "Yes" or "No" for confidential treatment.[4] SCE strongly supports basing confidentiality at the feature class level as opposed to the individual, specific field. As SCE has previously explained, all data fields in a particular feature class must be non-confidential for that feature class to be made public.[5] SCE has also explained that it has marked individual fields confidential because they contain Critical Energy Infrastructure Information (CEII), confidential customer information, or sensitive risk information and the Status Report template does not allow each field to be partitioned into multiple designations.[6] Given the interrelatedness of the geodatabase and the massive amount

[4] GIS Data Standard at p. 11.
[5] *See*, for example, SCE's Q1 2021 QDR at p. 5.
[6] *See*, for example, SCE's Reply to Public Comments on its May 2021 Quarterly Reports at p. 2.

of data it contains, maintaining confidentiality at the feature class level will best protect customers and safeguard the public against potential threats to the California electrical grid. SCE supports continued collaboration with Energy Safety, the IOUs, and stakeholders to improve the reporting of geospatial data and ensure critical asset and customer information are protected against potential threats that could harm the California electrical grid and our customers.

MAKING QUARTERLY REPORT SUBMISSION DATES DUE 45 DAYS AFTER THE END OF THE QUARTER WILL PRODUCE HIGHER QUALITY DATA

SCE appreciates Energy Safety's desire to "push the upper boundaries of current data collection and reporting efforts."[7] Energy Safety goes on to state that "consistent, high quality, and standardized data are fundamental to Energy Safety's ability to evaluate and monitor the implementation of electrical corporations' wildfire safety and WMPs effectively" and "expects electrical corporations' complete and total cooperation and diligent effort to bring their data submissions into full compliance with Energy Safety's requirements."[8] SCE supports pushing the upper boundaries and agrees that "consistent, high quality, and standardized data" are fundamental to reducing wildfire risk. Energy Safety's requirements and the timing thereof; however, are not aligned with utilities' ability to provide high quality data. As described above, SCE's current system and business processes require time to ensure accuracy. Utility work is complex. Even the best utility designed project can change due to field conditions. Requiring quarterly reports 30 days from the end of the quarter does not provide enough time to ensure high quality data. An additional 15 days would enable SCE to better align its geodatabase and performance management submissions, resulting in higher quality data – a fundamental requisite for Energy Safety to evaluate and monitor electrical corporations' wildfire safety. Pushing the upper boundaries also requires understanding of current limitations. In order to improve the data quality of quarterly reports, SCE recommends Energy Safety change the quarterly report due dates from 30 days after the end of the month to 45 days. Submission dates could be shortened over time as utilities deploy automated solutions for data consolidation and reporting.

CONCLUSION

SCE appreciates the opportunity to submit its comments on Energy Safety's Draft GIS Data Reporting Standard Version 2.2. 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

[7] GIS Data Standard at p. 1.
[8] GIS Data Standard at p. 1.