



February 16, 2022

Diana Gallegos
Director, Regulatory Relations
Southern California Edison Company
601 Van Ness Avenue, St. 2030
San Francisco, CA 94102

SUBJECT: SCE 2021 Q4 Quarterly Data Reports and 2022 Wildfire Mitigation Plan Data

Ms. Gallegos,

Pursuant to Energy Safety’s Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines,¹ adopted on December 14, 2021,² utilities were required to submit their 2021 Fourth Quarter (Q4) Quarterly Data Reports (QDRs) by February 1, 2022. Attachment 1 of the 2022 WMP Guidelines provides a summary of key changes to the template, including four new guidelines related to non-spatial data reporting, which are reflected in the new non-spatial data template (Attachment 3) and are as follows:

- **New Guideline 2.3a:** Table 2 of Attachment 3 includes additional entries (rows) to delineate the outcome metrics data by HTFD tier and wind condition (“wind warning status”) for risk events and utility-related ignitions.
- **New Guideline 2.3b:** Table 7.1 no longer includes ignition data, while Table 7.2 includes ignition data previously reported in Table 7.1.
- **New Guideline 2.3c:** Table 7.2 requires the utility to report on HFTD tier(s) and line type(s) in rows, allowing the use of Excel’s filtering tool.
- **New Guideline 2.3d:** Table 12 reflects all mitigation initiatives including the new requirements in Section 7 of the 2022 Guidelines (e.g., new initiative No. 65 on post-fire vegetation management practices).

The 2022 WMP Guidelines provide a schedule and instructions for QDR submissions (included in Attachment 5), which required that non-spatial data submissions were to follow the schema

¹ Energy Safety’s Final 2022 WMP Update Guidelines (accessed February 3, 2022):

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>.

² Energy Safety formally adopted the 2022 WMP Update Guidelines on December 14, 2021, during a public meeting held pursuant to Government Code 15475.6. The meeting agenda, slide deck, and a link to the video recording can be found here (accessed February 3, 2022): <https://energysafety.ca.gov/events-and-meetings/events/adoption-of-the-2022-wmp-update-guidelines/>.

of Attachment 3: 2022 Performance Metrics Data Templates. Further, the final 2022 WMP Guidelines removed the requirement for utilities to submit updated data, including 2022 and 2023 projections, concurrent with submission of a WMP. Instead, Energy Safety intended that the 2021 Q4 QDR submission would include projections and would constitute the utilities' complete WMP data submissions for 2022.

Southern California Edison Company (SCE) timely submitted its 2021 Q4 QDR on February 1, 2022 using the correct template; however, SCE did not include 2022 and 2023 projections. Further, Energy Safety learned that the eight utilities required to submit WMPs believed that all projections and updated data would be submitted in a separate filing concurrent with the submission of each electrical corporation's WMP.

After discussion with SCE, Energy Safety agreed that SCE must submit updated 2021 Q4 QDR data, along with projections required for WMP evaluation, according to the schedule set forth below.

Table	Submission Status
Table 1	SCE submitted Table 1 on 2/1, but with additional sub-metrics, which have been re-formatted per OEIS's 2/4 email and re-sent on 2/11
Table 2	SCE submitted Table 2 in the new format on 2/1, but with additional sub-metrics, which have been re-formatted per OEIS's 2/4 email and re-sent on 2/11
Table 3	SCE submitted Table 3 on 2/1
Table 4	SCE submitted Table 4 on 2/1
Table 5	SCE submitted Table 5 on 2/1
Table 6	SCE submitted Table 6 on 2/1
Table 7.1	SCE has submitted forecasts for 2022 on 2/11; forecasts for 2023 will be sent on 2/18 with its WMP
Table 7.2	SCE submitted actuals for Table 7.2 in the new format on 2/1 and has submitted forecasts for 2022 on 2/11; forecasts for 2023 will be sent on 2/18 with its WMP
Table 8	SCE submitted all but the AFN data for Table 8 on 2/1, and has included the AFN data in its 2/11 submission (Note: SCE interprets this table as a request for year-end status and, as such, intends to update 2022 columns with its 2022 Q4 QDR)
Table 9	SCE will submit 2021 actuals and 2022 forecasts for Table 9 with its WMP on 2/18
Table 10	SCE will submit 2021 actuals and 2022 forecasts for Table 10 with its WMP on 2/18
Table 11	SCE submitted 2022 forecasts for Table 11 on 2/11
Table 12	SCE submitted actuals for Table 12 in the new format on 2/1 and has submitted forecasts for 2022 and 2023 on 2/11

Energy Safety appreciates SCE's cooperation and strict adherence to the timelines set forth above.

Sincerely,

Melissa Semcer

Melissa Semcer
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Office of Energy Infrastructure Safety