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Ralph Armstrong, Board Member
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E-File Docket # 2023-WSAB-WMP-GPSCA

California Wildfire Safety Advisory Board
300 Capital Mall, 5th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Comments on the California Wildfire Safety Advisory Board's Draft Recommendations to Office of Energy Infrastructure Safety on Additional Wildfire Mitigation Plan Requirements and Performance Metrics

Dear Chair, Vice Chair, and Board Members:

Southern California Edison Company (SCE) hereby submits its comments in response to the Wildfire Safety Advisory Board's (WSAB) April 18, 2022 Draft Recommendations to Office of Energy Infrastructure Safety (Energy Safety) on Additional Wildfire Mitigation Plan (WMP) Requirements and Performance Metrics (Draft Recommendations).

INTRODUCTION

SCE agrees with many aspects of the WSAB's Draft Recommendations, especially the focus on collaboration. Wildfires are a threat to the entire state and a collaborative approach to addressing this threat can improve our ability to respond productively and efficiently. SCE provides comments on a few key issues including structure and scope of the WMP guidelines, risk modeling and reporting, vegetation management (VM), system design and operation, and communication and community outreach.¹ As discussed in more detail below, the Board's Final Recommendations to Energy Safety should consider SCE's comments herein.

¹ SCE's silence on any particular recommendation should not be interpreted as acceptance of, agreement to, or acquiescence with that recommendation.

STRUCTURE AND SCOPE OF THE 2023 WMP GUIDELINES

SCE generally supports WSAB's recommendation that Energy Safety continue to coordinate WMP evaluations with other governmental entities, in particular, the California Public Utilities Commission (CPUC or Commission) and its relevant proceedings.² However, SCE requests that WSAB clarify its recommendation regarding "*deepening the linkage* between Energy Safety and CPUC oversight of IOU general operations, including authorization of wildfire mitigation actions and the *funding of those actions*."³ WSAB's recommendations must be reconciled with Energy Safety's statutory requirements to timely review WMPs,⁴ ensure that IOUs minimize risk of wildfire posed by electrical lines and equipment,⁵ and that IOUs "achieve the highest level of safety, reliability and resiliency"⁶ and not to encroach on funding authorization as that is the sole responsibility of the CPUC,⁷ which is typically evaluated in IOUs' general rate cases (GRC). WSAB goes on to state that IOUs' scope and cost forecasts in the WMPs should be consistent with IOU GRC filings at the CPUC and that, "The CPUC's efforts and outcomes in these proceedings and the actions required by the WMP guidelines *demand synchronization* to optimize the State's wildfire oversight and the IOUs ability to meet its objectives."⁸ These recommendations should be more fully evaluated consistent with PUC § 8386 and in the context of the timing of other internal utility business and operational planning processes.

SCE also generally supports WSAB's recommendations to eliminate redundancy and streamline the WMP requirements.⁹ SCE notes that on April 22, 2022, Energy Safety held a workshop on proposed 2023 WMP Guidelines and SCE looks forward to submitting comments by the requested deadline of May 6, 2022 to further streamline these guidelines. Changes to the guidelines should be viewed from the perspective of minimizing the risk of wildfire posed by electrical infrastructure,¹⁰ in high-fire risk areas,¹¹ and limit the content to the statutory requirements reflected in PUC § 8386(c). SCE cautions against additional requirements that are not meaningful in pursuit of reducing wildfire risks.

RISK MODELLING AND REPORTING

WSAB recommends utilities "avoid describing risks or model parameters, etc. as unknown" and that "maps to be created defining polygons of priority."¹² SCE appreciates these recommendations and agrees that language describing modeling parameters should be precise when possible. SCE also notes that modeling is inherently uncertain and while SCE continues to improve its risk descriptions and

² WSAB Comments at p. 13.

³ WSAB Comments at p. 9 (emphasis added).

⁴ Public Utilities Code § 8386.3.

⁵ *Id.* § 8386(a).

⁶ *Id.* § 8386(c)(14).

⁷ *Id.* § 8386.4.

⁸ WSAB Comments at p. 9 (emphasis added).

⁹ WSAB Comments at pp. 9-13.

¹⁰ *Id.* § 8386(a).

¹¹ *Id.* § 8386(c)(17).

¹² WSAB Comments, pp. 14-16.

modeling, inevitably there will always be some amount of unknown information or uncertainty. SCE 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 methodologies can have unintended impacts. Therefore, recommendations like these 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 proceeding currently pending before the Commission.

SCE disagrees with WSAB's recommendation requiring that in their WMPs utilities track and describe all NOV/NODs issued by all state agencies.¹³ OEIS appropriately rejected the same unnecessary and burdensome recommendation made by WSAB for the 2022 WMP. Rejection of WSAB's recommendation is even more appropriate now that OEIS now has its own statutory basis for issuing NOV/NODs. These notices and responses are publicly available and accessible to WSAB and all stakeholders.

VEGETATION MANAGEMENT: STRATEGIES AND ENVIRONMENTAL STEWARDSHIP

With respect to WSAB's comments about tree replacement services,¹⁴ SCE provides tree replacement services as part of its Hazard Tree Management Program, and on a case-by-case basis for its line clearing program. Further, SCE has a Right Tree Right Place program which disseminates information to customers about safe tree options and landscaping selections. Through educational opportunities, SCE encourages its customers to select appropriately sized vegetation (at maturity) when making planting choices - whether replacement or initial planting – to limit encroachment on electrical assets. The Right Tree, Right Place program is created by ISA-certified arborists with knowledge and expertise about the types of trees that are compatible and can be in proximity with electrical infrastructure. Broader reforestation projects (for example, after a wildfire) informed by ecologists and fire scientists reach beyond the scope and goals of protecting utility assets and managing the electrical system in a way that mitigates or reduces ignitions, and additionally may not be feasible given the utility's jurisdiction and property rights. For these reasons, SCE does not agree that reporting on tree replacement programs informed by ecologists and fire scientists on staff or under contract with the utilities should be required in the 2023 WMP.

In response to WSAB's recommendations about the use of low-growing shrubs,¹⁵ SCE agrees that pilot programs related to utility defensible space (UDS) are worthwhile;¹⁶ however given SCE's limited property rights, the success of these programs often depends on willing collaboration by large scale property owners such as the U.S. Forest

¹³ WSAB Comments, pp. 15-16.

¹⁴ WSAB Comments, p. 21.

¹⁵ WSAB Comments, pp. 21.

¹⁶ See pgs. 516-517 of SCE's 2022 WMP Update.

Service. Any requirements in the 2023 WMP Guidelines should be mindful of the utility's limited ability to independently execute UDS programs.

SYSTEM DESIGN AND OPERATION: GRID HARDENING, WORKFORCE MANAGEMENT, ASSET INSPECTIONS AND EMERGING TECHNOLOGY

WSAB recommends that the “2023 WMP Guidelines should request that utilities provide specific information about responses to lessons learned from prior fires, from research projects, and fire or weather-related experiences elsewhere in the country and world.”¹⁷ SCE agrees that prior fires, and fire or weather-related experiences, trends and issues across the country and world are important for learnings but does not believe it should be added as a WMP requirement. Much of what is recommended already takes place to inform SCE’s mitigation portfolio as SCE has presented in the WMP. SCE’s Fire Incident Preliminary Analysis (FIPA) process uses insights and lessons learned from prior fires.¹⁸ For example, in the past SCE experienced an ignition associated with degradation at the top of a crossarm; subsequently SCE implemented aerial inspections which inspect structures and equipment from above, in addition to traditional ground-based inspections. SCE works with other utilities who have developed technology that SCE is piloting. SCE also participates in the International Wildfire Risk Management Consortium (IWRMC) and four joint-IOU working groups. SCE takes learnings from those collaborative forums to determine if the same risks exist at SCE and decide if any action/revision to the wildfire mitigation strategy is needed. Finally, this information will likely become duplicative with existing requirements that utility WMPs must include specific sections on lessons learned, research projects, and collaborative work with other entities.

WSAB also recommends that “The 2023 WMP Guidelines should require the utilities to identify any equipment or lines that may still be energized but not serving load and analyze whether and how best to de-energize those lines and equipment and/or remove them from service.”¹⁹ SCE does not object to the recommendation that IOUs evaluate the risk involved in keeping idle lines or equipment energized as compared to disconnecting completely when not in use, but notes that overhead energized lines/equipment that are not providing electric service to a customer are still inspected and maintained by SCE so as not to create a safety hazard. SCE's practice is to de-energize certain sub-transmission line segments, designate them out-of-service and continue to inspect and maintain until such time as a final determination can be made that the subject structures/wires or underlying land or rights-of-way have no foreseeable use, at which time plans are made to remove the facilities. For overhead distribution lines and equipment, SCE has established guidelines to assess the value and necessity of said facilities in lieu of future electrical service need. In both instances, SCE follows GO 95 and when it is determined that such overhead facilities have no foreseeable use, plans are made and executed to remove said facilities. SCE believes additional tracking and reporting of out-of-service facilities to Energy Safety serves no useful purpose given

¹⁷ WSAB Comments at p. 25.

¹⁸ SCE 2022 WMP Update at pp. 471-473.

¹⁹ WSAB Comments at p. 25.

that such facilities are inspected and maintained in keeping with programs already described in detail in the WMP; however, SCE is willing to discuss this topic should WMP workshops be convened.

In addition, WSAB raises safety concerns about legacy facilities and assets that were built prior to the initial establishment of General Order (GO) 95 protocols in 1941,²⁰ both inside and outside the HFTD, and recommends that IOUs identify any such legacy equipment and describe what modification, operation, and inspection protocols they are applying to that equipment.²¹ As SCE has previously explained to the WSAB,²² SCE regularly patrols, inspects, and maintains its power lines and assets, including those built prior to the adoption of GO 95. For example, SCE inspects its transmission lines in accordance with NERC requirements for vegetation management (Reliability Standard FAC003) on established intervals. Additionally, SCE patrolmen regularly inspect transmission lines to identify potential line problems such as reduced span clearance, tower or line hardware problems, or other conditions of concern. SCE also complies with maintenance and inspection requirements for transmission lines including NERC Reliability Standard FAC-501-WECC-2, CAISO Transmission Control Agreement Appendix C, CPUC GO 95 Rule 31.2, and CPUC GO 165 Section IV. SCE also performs supplemental inspections of its overhead lines located in its HFRA in accordance with its WMP. These regular patrols and inspections serve as additional means to monitor lines for potential safety and reliability concerns. Due to the extent of existing requirements and practices to inspect and maintain these assets, SCE does not see a basis or value in additional reporting requirements.

WSAB recommends utilities describe their protocols to provide for workforce safety when introducing new technologies or equipment and implementing new work practices.²³ Workforce safety is a critical aspect of SCE's business practices and SCE has processes in place to help ensure the safety of our workforce.²⁴ This recommendation is not needed to further reduce wildfire risk. SCE agrees with Energy Safety that this recommendation is not applicable to the WMP and better addressed by

²⁰ SCE understands GO 95 Rule 12.3 to be applicable to overhead distribution and transmission lines constructed prior to July 1942, which for today would mainly impact certain transmission lines comprised of support structures, wires, insulators, hardware, etc. The wire-to-wire and wire-to-ground/object clearances adopted in 1942 were, in many cases the same or similar to clearances specified in preceding GOs 64 and 64A. Further, although engineering and design of overhead power lines has evolved and progressed since the issuance of GO 64 in 1928, SCE continues to evaluate and inspect these vintage structures and has ongoing plans to refresh and replace these lines or segments of these lines.

²¹ WSAB Comments at p. 23.

²² SCE Comments on the WSAB's Draft Recommendations on the 2021 WMP Updates for Large IOUs, at p. 8.

²³ WSAB Comments at p. 23.

²⁴ See SCE's Comments on WSAB's Draft Recommendations on the 2021 WMP Updates for Large IOUs at pp. 6-7.

the California Division of Occupational Safety and Health and/or CPUC health & safety standards.²⁵

COMMUNICATION AND COMMUNITY OUTREACH

WSAB recommends that the 2023 WMP Guidelines require utilities to include continued and enhanced reporting on utility collaborative efforts with local governments and community-based organization (CBOs) and include additional reporting on their customer outreach evaluation analytics and how these measurements guide next steps.²⁶ SCE notes that its WMP already includes detail on its collaboration efforts with local governments and CBOs and customer outreach evaluation analytics, as well as in other various reports provided to the Commission related to PSPS, such as the PSPS Post Season Report, Access and Functional Needs Plan, and others, as required. Therefore, SCE recommends against unnecessarily increasing and/or duplicating the utilities' robust reporting obligations via this proposed WMP requirement.

CONCLUSION

SCE appreciates the opportunity to submit its comments on WSAB's Draft Recommendations.

If you have any questions, or require additional information, please contact me at michael.backstrom@sce.com.

Sincerely,

//s//

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VP Regulatory Policy Energy & Environmental Policy
Southern California Edison

²⁵ See OEIS's October 29, 2021 Analysis and Recommendations on the WSAB's 2021 Recommendations Report at pp. 36-37.

²⁶ WSAB Comments at p. 27.