

Docket# 2023-WMPs

05/06/22

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Comments Regarding Workshop on 2023 Wildfire Mitigation Plan
Guideline Development

Dear Director Thomas Jacobs,

Pursuant to the Public Meeting Announcement regarding the Office of Energy Infrastructure Safety's (Energy Safety) Workshop on 2023 Wildfire Mitigation Plan Guideline Development held on April 22, 2022, Southern California Edison (SCE) respectfully submits the comments provided below.

1 INTRODUCTION & SUMMARY

SCE appreciates the opportunity to provide comments regarding the presentation by Energy Safety and its consultant Jensen Hughes on the development of guidelines for 2023 Wildfire Mitigation Plan (WMP).

SCE organizes its comments along four main categories.

In General Themes, SCE proposes that Energy Safety provide additional opportunities for input and dialogue, and that draft guidelines should be released no later than early August. SCE also proposes that changes to WMP guidelines should be considered from the perspective of providing benefits commensurate with the effort and resources necessary to implement additional requirements.

In Restructuring of the Guidelines, SCE:

- Agrees with the need to streamline the WMPs but notes that efforts to restructure the WMPs should be combined with efforts to reduce content that is unnecessary or redundant.
- Indicates support for efforts to better distinguish "comprehensive" WMP filings from WMP "Update" filings, which by definition should be less "comprehensive".
- Describes how outcome-based metrics are best utilized to measure the effectiveness of the portfolio of mitigation activities, as opposed to being used to evaluate individual mitigation activities.

- Explains its view that the proposed Petition Process is unnecessary and would create undue burden.
- Explains how imposing a “freeze” on the risk model or on risk-informed decisions should be designed carefully to avoid impeding a utility’s ability to make timely changes to its risk models that will prevent the utility from targeting its mitigations to the highest risk areas.
- Offers its view that new reporting on compliance division violations and defects would be redundant and create unnecessary administrative burden.

In its comments on the Risk Assessment component of the Energy Safety workshop, SCE indicates support for the proposal to increase documentation related to risk modeling but proposes flexibility for utilities to provide this information in existing formats, as opposed to a more restrictive template that will create unnecessary administrative work. SCE also provides comments seeking further clarity on proposed data reporting related to historical ignitions.

In its comments on the Maturity Model, SCE notes that while the maturity model is a reasonable proxy and indicator of a utility’s ability to successfully mitigate wildfire risk, maturity should not be mistaken as an end in itself or as equivalent to the successful design and implementation of mitigations that reduce wildfire risk.

SCE also notes that adding a section for a utility to describe how an initiative is “expected to advance their maturity” shifts focus from risk reduction to maturity advancement. It establishes a problematic priority that utility efforts should focus on maturity advancement, which for certain capabilities and/or their respective maturity levels may neither be a prudent nor necessary use of resources in a given WMP period.

2 GENERAL THEMES

2.2 SCE Agrees With Cal Advocates That Additional Opportunities For Stakeholders To Understand And Provide Feedback Would Be Beneficial Prior To Issuance Of The Completed Draft Guidelines

SCE appreciates Energy Safety’s early communication and collaboration on the development of 2023 WMP guidelines. Energy Safety’s workshop provided a high-level overview of potential new structures, content, and analyses to be required in future WMPs. Energy Safety and Jensen Hughes presented a wide variety of possible changes to the 2023 WMP requirements. While the workshop was a helpful introduction, given breadth of the issues presented, it was not possible to fully evaluate the implications of many of the proposals without having knowledge of the underlying details.

SCE agrees with the comments made by Cal Advocates during the workshop that additional workshops and information exchanges would be beneficial to establish guidelines that are well-understood, meaningful, and feasible. SCE requests that, where possible, additional details be provided to stakeholders regarding the specific proposals discussed for each of the three categorical areas (Restructuring of the Guidelines, Risk Assessment, and Maturity Model). This information would be most helpful if provided in advance of the subsequent workshop(s) so that stakeholders have an opportunity to read and formulate questions and feedback in advance of the workshop.

SCE suggests that draft guidelines be provided by early August and final guidelines be issued by early September. Additionally, SCE supports a condensed comment period on the draft guidelines (e.g., 15 days instead of 30 days) to allow for earlier issuance of the final guidelines. Energy Safety could consider staggering the release of guidelines for the 2023-2025 Base WMP from guidelines for the 2024 WMP Update.

2.3 Changes To WMP Guidelines Should Be Considered From The Perspective Of Providing Benefits Commensurate With The Effort And Resources Necessary To Implement Additional Requirements

SCE supports Energy Safety's objective to streamline the guidelines in order to facilitate achievement of its goals. However, many of the proposed changes may have the opposite effect of that intended. The 2023 WMP will be the fifth iteration of the annual WMPs. Each successive WMP has included both incremental and often significant expansions of the guidelines from the prior year (despite the fact that the WMP statutory requirements have not materially changed over this time period). Each change requires utilities to understand, adapt to, and implement new requirements in a short period of time (typically months). Likewise, stakeholders must adapt their reviews to conform to the new structures and content, such as to perform year-over-year comparisons. Internal utility reporting practices, business processes, and systems typically require modification to support compliance with the new guidelines. While it may not be easy to quantify, changes to the guidelines impose significant costs and resource requirements.

SCE suggests that, a) changes should be prioritized, with some considered on an incremental or phased-in basis over time, and b) potential increases to complexity and depth of WMP requirements should be balanced with the significance of any corresponding benefits to the process.

2.4 Updated Guidelines Should Articulate The Full Procedural Schedule Of A WMP Review, From WMP Submission Through Final Decision

SCE appreciates the added timing and process clarity Energy Safety has increasingly provided to the WMP process with each successive round of WMPs. Particularly with the issuance of the 2022 Guidelines, stakeholders were provided with due dates for procedural elements such as WMP submissions, workshops, discovery, stakeholder comments and reply comments, and draft Action Statements.

There continues to be opportunity to provide additional clarity for the procedural steps and timing after a Draft Action Statement is issued. The past several WMP cycles have included various additional procedural requirements (e.g., Critical Issues, Revision Notices, Deficiencies) where utilities were presented with new requirements and timelines that were unanticipated. For purposes of more efficient forward planning, it would be helpful for the Guidelines to clearly articulate all potential post-Draft Action Statement requirements – including the specific timelines associated with each.

In its comments on restructuring the WMP process, SCE suggests Energy Safety consider if post-Draft Action Statement requirements can be incorporated into the next WMP, as opposed to resolved as a standalone filing (e.g., former Progress Reports). SCE recommends that mitigation initiative changes should also be requested as part of the next WMP Update as well. SCE offers this suggestion as a practical solution to the administrative challenges of having standalone filings so close to the next year's WMP Update that can easily be integrated into that Update.

3 RESTRUCTURING OF WMP GUIDELINES

WMP submissions require significant resources to prepare and evaluate due to their complexity and length. Over the course of SCE's WMP filings from 2019 through 2022, the main body of SCE's WMP has grown from 133 pages in 2019 to 799 pages in 2022. In addition, utilities provide multiple and extensive data reports each quarter,¹ an annual maturity model response, an annual report on compliance, a change orders report, and other documents throughout the year. SCE values the opportunity to restructure and refocus the primary annual WMP filing and associated processes and filings.

3.1 SCE Agrees With The Need To Streamline The Wmps, But Changes Should Focus On Both Improved Organization And Reduction Of Unneeded Or Duplicative Content

SCE share the views stated in the workshop to “streamline [the] WMP main body”² and “optimize WMP submissions”.³ While the importance and complexity of wildfire mitigation make it unavoidable that WMP filings will be extensive, the more that they can be focused and simplified to critical issues, the more that Energy Safety and other stakeholders will be able to evaluate WMPs efficiently.

Improved organization and restructuring should be combined with efforts to reduce unnecessary or redundant content. The workshop included many indications of new or expanded content for the WMPs,⁴ and suggested a direction in which the structure would change but the overall length and depth would increase relative to past WMPs.

To achieve the goal for WMPs that are both streamlined and optimized, SCE recommends several areas in which redundant or ancillary content can be considered for simplification or removal:

1. Removal of activities from the WMP whose primary intent is not reduction of wildfire risk in HFRA. Examples include, capacitor, crossarm, and transformer maintenance and replacements, pole loading, intrusive pole inspections, etc. These activities are performed in utilities' entire service area, not just HFRA, and for reasons other than wildfire mitigation. Including them in the WMP introduces significant burden upon utilities to separate out costs between HFRA and non-HFRA and to intervenors and Energy Safety in evaluating them without a corresponding benefit, as utilities would perform these tasks even absent the need for wildfire mitigation.
2. The workforce planning section (5.4 in SCE's 2022 WMP) could be simplified to avoid significant repetition, especially for field-based roles.
3. Reduce the amount of PSPS content in the WMP. Energy Safety should consider streamlining the PSPS-related content by integrating Chapter 8 into the

¹ The GIS Data Schema requirements have also increased since inception, including approximately 40 changes to attributes and domain values since the first GIS Data Schema to the current version 2.2.

² 2023 WMP Guidelines Pre-Draft Workshop (PDF of presentation slides), Office of Energy Infrastructure Safety, April 22, 2022. Slide 13.

³ *Id.* at Slide 7.

⁴ *Id.* The following slides from the workshop presentation feature the “green box” graphic indicating new or expanded content, e.g. 15-18, 47, 58, 60, 66, 68, 70-72, 92-94.

appropriate sections within Chapter 7 (i.e., Grid Operations and Protocols and Stakeholder Cooperation and Community Engagement).

4. Removal of reporting on research proposals and findings from ongoing studies. The conclusions of a utility's research are not within scope of the statutory requirements of a WMP until they begin to impact the actual wildfire mitigation initiatives. As such, reporting on research proposals and ongoing research before they manifest in a utility's wildfire mitigation strategy is premature and introduces extra work for Energy Safety, intervenors, and utilities.

3.2 Restructuring WMP Initiative Groups Should Consider Unintended Impacts Such As Complications To Year-Over-Year Comparisons And The Need To Substantially Re-Do Narrative Descriptions

SCE suggests that Energy Safety consider two factors when considering re-organization or regrouping of WMP initiatives.

First, before changes are made, Energy Safety should consider whether such changes will make it difficult to perform year-over-year comparisons. If reporting metrics or categories are modified, the differences could make the data or categories sufficiently dissimilar from prior years such that a new baseline (presumably 2023) would need to be established.

Second, Energy Safety should consider whether a potential category grouping change would be a simple "lift and shift", meaning little impact beyond moving content from one place to another within the WMP, or a more impactful change that would require an entirely new narrative. For example, if an activity is moved to a new section, the existing narrative description could require a substantial overhaul to be more properly oriented within its new context. SCE suggests that if such an effort is required, it should have a corresponding benefit (i.e., the new organization approach should meaningfully improve the ability of Energy Safety and other parties to evaluate the WMP).

3.3 SCE Supports Efforts To Improve The Distinction Between The Base WMP And Subsequent WMP Updates, And Suggests Prioritizing The Release Of Guidelines For The Base WMP

Energy Safety provides additional clarity on how it intends to distinguish a "Base WMP", which covers a three-year period (e.g. 2023-2025), from an "Update WMP", which would cover either the second or third year of the Base WMP period (e.g., 2024 or 2025). SCE agrees with Energy Safety's concept to "Limit WMP Update to (a) progress reporting and (b) permissible revisions to the base, 3-year WMP."⁵

While SCE has identified some proposed modifications to these two items in these Comments, this concept is an improvement over the current guidelines for WMP Updates, which essentially require the creation of new comprehensive WMPs each year.

SCE discusses the specific components of Energy Safety's WMP Update proposal below. WMP Updates should include the following:

⁵ *Id.* at Slide 28.

- Modifications to annual compliance targets (if necessary);
- Incorporation of new initiatives as they become known and available;
- Changes to initiative strategies that result in material changes in risk, approach, or spending;
- Updates to RSEs (subject to a materiality threshold); and
- Updates to scope and costs for mitigation initiatives.

To accelerate the timelines of 2023 guidelines, Energy Safety could consider staggering the release of guidelines for the 2023-2025 Base WMP from guidelines for the 2024 WMP Update.

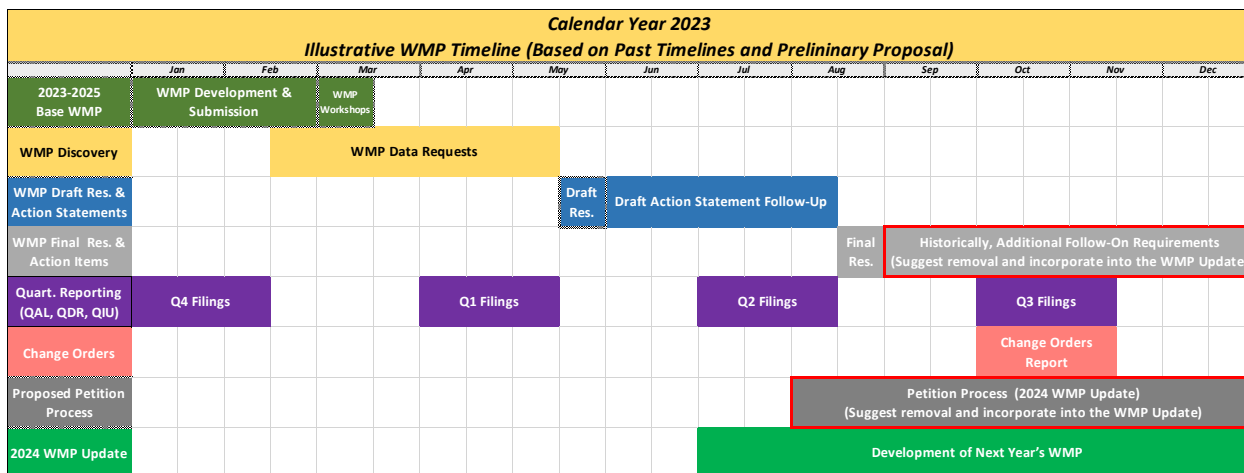
3.4 Adding Additional Processes Such As The Petition Requirement Will Further Strain Resources, Increase Complexity, And Impede The Intention To Streamline And Improve The Overall WMP Cycle

As stated in the workshop, the WMP schedule requires Energy Safety to perform simultaneous reviews of multiple WMP filings under tight time constraints. The WMP is essentially a year-round effort due to the extensive number of requirements, associated quarterly filings, discovery, and action statements. As indicated by the chart SCE created below, which includes the proposed timing for the petition process⁶ and overlays several components of past WMP processes, many elements of the WMP process overlap. This requires significant resources to prepare and creates a timeline disconnect in which preparations and review of the subsequent WMP commence before the prior year's filing has been fully resolved.⁷

The proposed petition process, as understood by SCE, would exacerbate these problems. In addition to being redundant with the notion of the Update WMP—which is intended to describe proposed changes—the petition window as a practical matter would be limited to the latter half of the year, as it would logically need to follow the submission and review of the most recently filed WMP. At that point the petition process would be concurrent with the process to plan and develop the subsequent WMP.

⁶ *Id.* at Slide 32.

⁷ As exemplified in past WMP review processes, utilities have been required to continue litigating and responding to supplemental requirements to the current year WMP far into the end of that calendar year. Draft Action Statements issued in May are often accompanied by requirements to submit revised WMPs in 30-60 days, and subsequent Final Action Statements issued thereafter are often accompanied by further requirements to provide additional information (e.g., Progress Updates, Deficiencies) in Q4 of that same calendar year. SCE encourages Energy Safety to evaluate this continual extension of WMP requirements for the immediate calendar year WMP, by simply requiring further changes to be incorporated into the following year's WMP Update. This would allow all parties involved more time to meaningfully prepare for and dedicate resources towards putting forth a high quality WMP Update.



Note: Chart does not include: Independent Evaluator process, Safety Certificate, Safety Culture Assessment, PSPS Post-Event Reports, Other Reg filings (RAMP, GRC,

The timing of the proposed petition process⁸ presents two additional challenges: (1) Changes requiring “petition review” are likely to not be known until late in the petition process timeframe, and (2) by the time Energy Safety reviews and provides a response to a petition, it seems very likely that it would be too late for SCE to incorporate that proposed change into its WMP.⁹ SCE notes that based on historical experiences it could take up to five months for Energy Safety to issue a response to utility petitions.¹⁰

Finally, SCE identifies two items in the chart above with a red border: (1) The post-Final Action Statement Additional Follow-on Requirements, and (2) the Petition Process. For efficiency in process and resource utilization, and to provide clear delineation between WMPs, these two activities should be incorporated into the annual WMP Update processes. To the extent the Final Action Statement identifies ongoing requirements, those can be incorporated into the utility’s next WMP Update. And to the extent “permissible” changes are identified, SCE recommends that the changes should also be requested through the WMP Update. SCE offers this suggestion as a practical solution to the administrative challenges of having standalone filings so close to the next year’s WMP Update that can easily be integrated into that update.

This avoids two extra filings for each utility, avoids separate stakeholder Comments and Reply Comments to each of those filings, and avoids multiple Energy Safety reviews and decisions on these filings for each utility, as well as subsequent stakeholder Comments. Incorporating these two items into the next utility WMP Update would drive substantial efficiencies into the process for the benefit of all, without compromising the ability to require further modifications and improvements on the part of the utility.

⁸ PDF of presentation slides, Slide 32.

⁹ SCE notes that its WMP goes through iterative stages of internal reviews with management and leadership, up to and including its Board of Directors. Material changes received in December and January are therefore increasingly difficult to incorporate into the February WMP Update submissions.

¹⁰ Without further information, SCE uses the 2021 WMP Change Orders report ruling as a proxy for the time required to disposition requested changes to utility WMPs. In this case, Utilities submitted Change Order reports on November 1, 2021 and a ruling on these Change Orders was provided on April 11, 2022.

3.5 Further Discussion On Establishing And Measuring Outcome Metrics At The Mitigation Initiative Level Is Necessary

The preliminary proposal recommends outcome-based targets for initiatives.¹¹ In its 2022 WMP Update, SCE proposed five outcome-based metrics for the evaluation of the effectiveness of its wildfire mitigation activity portfolio.¹² SCE proposed these outcome-based metrics because WMP activities are ultimately designed to reduce wildfire ignitions associated with its electrical infrastructure and reduce the impact of PSPS de-energization events to customers.

SCE suggests that outcome-based targets are currently more appropriately and accurately tracked at a portfolio level. A risk driver could be addressed by multiple WMP activities, and it may not be possible to allocate the risk reduction benefits across the individual activities that collectively serve to mitigate the risk. Tracking outcomes such as ignition reductions, which are based on reducing the occurrence of an event, also pose the challenge of collecting an incomplete picture given that it is typically impossible to know the circumstances behind ignitions that never occurred. This further complicates the ability to link individual activities to outcome-based metrics and is why SCE proposed metrics at the portfolio level in its 2022 WMP.

Finally, outcome-based metrics also pose challenges to separate the impacts of mitigation activities from factors such as weather, climate, and local conditions. The influence of these external factors can be significant, and directly contribute to the many elements that ultimately lead to a risk event occurring (or not occurring). Over time, and with increased sophistication in modelling and metric design, SCE agrees it is reasonable to expect that the influence of external factors can be at least partially disaggregated from the outcome metrics and that long-term trends will emerge.

For these reasons, it is premature to require outcome metrics be established and tracked at the mitigation initiative level.

3.6 Timing Of Data Requests And Q4 Quarterly Report Timing

SCE appreciates that the current guidelines require parties to avoid issuing substantive data requests in the six-week time-period preceding a WMP submission, and requests OEIS continue this practice in future guidelines to allow utilities to focus their efforts on the development of their WMPs. Given the tight three-day timeline for data requests, SCE would appreciate a one-day increase in turnaround time. This would increase the data request turnaround to four days, which would significantly reduce the resource burden without a material decrease in the overall timeliness of the response. This would allow subject matter experts and regulatory staff with increased time to review and prepare well-developed responses.

SCE also proposes aligning the Q4 Quarterly Reports with the WMP submission. Currently, the Q4 Quarterly Reports are due in the weeks prior to the WMP submittal,

¹¹ PDF of presentation slides, Slide 19.

¹² SCE 2022 WMP Update, p. 177. CPUC reportable ignitions in HFRA (total and by key drivers including CFO, wire-to-wire contact, TCCIs, and EFF); Faults in HFRA (total and by the key drivers mentioned above); Wire-down incidents in HFRA; Number of impacted customers and average duration of PSPS events; Timeliness and accuracy of PSPS notifications.

creating an additional administrative burden and detracting resource efforts from the WMP filing. Utilities will gain efficiencies if these reports are submitted concurrent with the WMP filing. Alternatively, SCE proposes decoupling forecast data from recorded data. The quarterly reports currently include recorded data and several forecast data requirements such as projected risk events, ignitions, utility equipment additions, upgrades and removals, PSPS metrics, and costs and units. The quarterly reports should only include recorded data, whereas the annual WMP should include these projected data elements. The quarterly reports are intended to provide a status update of key metrics and projections included in the WMP and should not separately also require forecast data. Decoupling recorded and forecast data in the quarterly reports and WMP, would lessen the burden of submitting the Q4 Quarterly Reports weeks prior to the WMP.

3.7 Several Elements Of The Proposed WMP Update Structure And Content Should Be Modified Or Removed

Energy Safety defines six “key components” of the scope and structure for the WMP Updates.¹³ SCE summarizes its recommendation in response to each of the six key components in the table below and follows with additional discussion.

Component	SCE Recommendation
A. Revision Log	<ul style="list-style-type: none"> • Agree with inclusion of Errata, with clarification • Remove Change Orders [<i>Duplicative Requirement</i>] • Remove “Approved Petitions” as the Petition Process is not necessary • Add “Addition of New or Removal of Existing Mitigation Initiatives”
B. Re-run Risk Assessment	<ul style="list-style-type: none"> • Agree with re-evaluation of risk models given new data from prior year • Requirements to “freeze several aspects of risk assessment” should be designed carefully to avoid unintended consequences • Further discussion needed on “Post-wildfire and Near-Miss Retrospective Analysis”
C. Mitigation Initiatives Update	<ul style="list-style-type: none"> • Generally, agree with Progress Reporting concept; further discussion needed on details • Progress Reporting: Avoid Duplicative requirements
D. Maturity Model Updates	<ul style="list-style-type: none"> • No recommended process changes at this time; requires further detail to understand scope.
E. Compliance Division Corrective Action(s)	<ul style="list-style-type: none"> • Remove from WMP Update [<i>Duplicative Requirement</i>]
F. Appendices – Detailed Substantiation of Updates	<ul style="list-style-type: none"> • No recommended changes at this time; requires further detail to understand scope.

¹³ PDF of presentation slides, Slide 33.

3.7.1 Key Component A: Revision Log

1. The Only Errata From The Prior Year WMP That Should Be Included In The Revision Log Should Be That Which Pertains To Information Included In The Update Itself That Has Not Previously Been Identified

Errata from the prior year's plan is typically issued subsequent to that WMP's submission, within the calendar year in which it is submitted. Therefore, that errata is already published and available to the public. The only errata that would be meaningful to include in the Update would be that which pertains to the Update itself, and that has not previously been identified in prior errata.

2. Including Change Orders In The Revision Log Would Duplicate Information Already Provided In The Annual Report On Compliance

Pursuant to California Public Utilities Code § 8386.3(c)(1)¹⁴ and Energy Safety's guidance, each utility's Annual Report on Compliance must include:

*"A full and complete listing of all **change orders** and any other operational changes [...] with an explanation of why the changes were necessary, and an assessment of whether the changes achieved the same risk reduction intent."¹⁵*

To avoid duplication, the Revision Log should not require information on Change Orders.

3. The Proposed Petition Process Is Duplicative Of The Intent Of The WMP Update And Adds An Unnecessary Administrative Step Into A Process That Is Already Constrained For Time.

SCE opposes the petition process. From the brief introduction provided in the workshop, the petition process appears to present an unnecessary and additional administrative process that overlaps with existing WMP development timeframes and creates unnecessary redundancy with the WMP Update review process. Please see SCE's comments above in section 3.4 for additional explanation of SCE's position.

4. The Revision Log Should Document New Mitigation Initiatives Added As Well As Those Removed

The Revision Log should identify any new mitigation initiatives that are proposed in a utility WMP Update, as well identify any mitigation initiatives that have been proposed for removal. This will provide a quick and summarized review of these major changes as part of the Revision Log.

¹⁴ "Three months after the end of an electrical corporation's initial compliance period, as established by the Wildfire Safety Division pursuant to subdivision (b) of Section 8386, and annually thereafter, each electrical corporation shall file with the division a report addressing the electrical corporation's compliance with the plan during the prior calendar year."

¹⁵ <https://energysafety.ca.gov/wp-content/uploads/docs/misc/wsd/2021.02.16-compliance-operational-protocols.pdf>.

3.7.2 Key Component B: Re-Run Risk Assessment

1. Clarify Requirement To “Freeze Several Aspects Of Risk Assessment”

The workshop materials introduce the concepts of “Freeze process for risk-informed decision-making” and “Freeze high-level mitigation strategy”.¹⁶ A “freeze” to changing risk modeling or risk-informed decisions should be designed carefully to avoid unintended consequences. If not implemented thoughtfully, a freeze could impede a utility’s ability to make appropriate and timely changes to its risk models (e.g., update new fuel conditions) and prevent the utility from using the updated risk models to target mitigations to the highest risk areas.

Considerations when discussing updates to utility risk models should include a threshold for changes that could be made, distinguishing between source data refreshes versus more substantial modeling changes, and preserving the ability for the utility to make reasonable decisions to improve its design and implementation of mitigation activities between WMP cycles. SCE also notes that a freeze, if implemented, should consider how different types of activities may have different needs regarding the frequency of risk modeling updates. For example, longer-term activities such as grid hardening may require updates less often, while activities performed on an annual basis such as inspections should be informed by the most up-to-date model inputs and design.

While the workshop materials indicate that “significant changes are possible” through the new Petition Process, SCE noted above the timing problems associated with the Petition Process that will also prove cumbersome and ineffective in making changes to target the highest risk areas.

To the extent the desire is to gain more information around what changes were made to the model and how those changes resulted in re-prioritization of mitigation activities, utilities could include descriptions of those modeling changes and how those changes influenced decision making on the suite of selected mitigations in the WMP Update.

2. Further Discussion Is Warranted For “Post-Wildfire And Near-Miss Retrospective Analysis” For The Update Submission

Energy Safety presents new or expanded requirements for post-wildfire and near miss retrospective analysis for the WMP Updates.¹⁷ SCE seeks further clarification and collaboration on this topic before incorporation into the 2023 WMP guidelines. SCE notes that some ignitions / near-misses may not have been caused by process or equipment failures (e.g., vegetation fly ins) and may not require remedial action plans. Additionally, there are existing processes where SCE provides data and analysis related to actual ignitions to Energy Safety and the CPUC.

3.7.3 Key Component C: Mitigation Initiatives Update

1. Further Clarity Is Needed As To What Is Required As Part Of The Progress Reporting Requirement.

¹⁶ PDF of presentation slides, Slide 36.

¹⁷ *Id.* at Slide 37.

SCE generally agrees with the concept of including concise and meaningful year-to-year progress updates on mitigation initiatives in the WMP Update. However, it is not clear from the workshop discussion or slides¹⁸ what specific information would be required and how it would be presented. SCE would appreciate further collaboration on this requirement.

2. Progress Reporting Should Not Duplicate Existing Material In The Quarterly Data Reports, Quarterly Notification Letters, Or Annual Reports On Compliance.

The preliminary proposal suggests that the Progress Update would include “QDR data (non-spatial data + GIS data)” and information on “Discrepancies ... Narratives to explain higher/lower performance [and] Proposed action plan to get back on track.”¹⁹ SCE would appreciate further discussion on what this information will be and clarity on the intent of including this information in the WMP Update. Currently it appears that this information will be largely – if not entirely – duplicative of material already required to be produced in utility Quarterly Data Reports (Spatial and non-Spatial), Quarterly Notification Letters, and/or Annual Reports on Compliance. As a guiding principle, SCE encourages the Guidelines to avoid duplicative information where possible.

3.7.4 Key Component D: Maturity Model Updates

SCE agrees that an annual update of maturity model survey responses is reasonable. SCE provides further feedback on the proposed maturity model changes in the Maturity Model section below.

3.7.5 Key Component E: Compliance Division Corrective Action(s)

The workshop materials proposed a “summary table of key Compliance Division findings” related to “Compliance Division Violations and Defects” that would “allow verification of feasibility of initiative objectives and targets”.²⁰ Reporting on compliance division violations and defects would be redundant and unnecessary.

SCE does not support this additional WMP requirement. Existing statutes and Energy Safety regulations govern the notice of violation and notice of defect process, including notice, response, and requests for written hearing.²¹ NOVs and NODs issued by Energy Safety and utility responses are posted on Energy Safety’s publicly accessible website, and the written hearing process is open to public participation. Energy Safety’s final determination is also posted publicly. The scope of the WMP properly does not include review or evaluation of findings, violations, or defects. These issues have already been resolved in a separate process, so inclusion of this material is unnecessary and redundant, and will expand a set of WMP requirements that are already in need of streamlining and removal of unnecessary material. Finally, this information is already publicly available and summarized in the Annual Report on Compliance and there is no need to restate it in the WMP.

¹⁸ *Id.* at Slide 30, 38.

¹⁹ *Id.* at Slide 30.

²⁰ *Id.* at Slide 40.

²¹ See Government Code §§ 15475.2 and 15475.4 and California Code of Regulations, Title 14, Division 17 (Emergency Regulation) §§ 29104 and 29302,

3.7.6 Key Component F: Appendices – Detailed Substantiation Of Updates

SCE requests that Energy Safety provide additional detail on this key change, as it does not appear to be further explained in the materials. SCE refers to its comments above, in which SCE supports efforts to streamline the WMPs and reorganize materials but notes that reorganizing should be combined with reduction in order to make a more substantial impact on the trend in which WMP filings have increased in size every year.

4 RISK ASSESSMENT

Energy Safety identified four key changes in the materials presented at the workshop. SCE responds to each below.

4.1 Key Change #1: Increased Transparency In Risk Calculation Methodology

SCE generally supports this recommendation. SCE suggests that utilities have flexibility to document and explain their methodology provided it contains the information requested by Energy Safety and meets expectations for clarity and detail. This approach can satisfy the needs of Energy Safety and parties who review the information without creating a needlessly burdensome administrative task for utilities to translate existing documentation into a new format.

4.2 Key Change #2: Additional Requirements For Model Substantiation

See comments above regarding Key Change #1.

4.3 Key Change #3: Additional Requirements For Model Documentation

See comments above regarding Key Change #1. SCE also notes that in some cases it engages third parties to perform risk modeling or provide risk modeling services, in which cases the third party may use proprietary methods that are commercially sensitive and not provided directly to SCE or should be treated confidentially.

4.4 Key Change #4: Expanded Requirements For Data And Risk Analysis

SCE provides three comments in response to the draft guidelines related to data governance.

First, any additional maps or data that present granular risk information must continue to be submitted confidentially. This is consistent with practices at both Energy Safety and the California Public Utilities Commission (CPUC) to protect sensitive information from bad actors.

Second, the draft template²² seeks to add a table containing circuit level risk, mitigations, interim strategies, and project timelines. SCE has over 1,000 circuits in its HFRA, and well over 100,000 circuit segments. This table as laid out would be impractical to develop, burdensome to review, and likely difficult to draw conclusions from. While SCE appreciates the need for Energy Safety to evaluate mitigations in detail, this level of reporting—especially considering the voluminous material already captured on a quarterly basis—would go beyond a point of providing marginal value in light of the commensurate burden. SCE welcomes further discussion on more practical and efficient ways to provide the requested information.

²² PDF of presentation slides, Slide 72.

Finally, the materials²³ include a proposal for expanded collection of ignition data along with retrospective analysis. Energy Safety should limit these requirements to ignitions in HFRA, as that is most applicable to the evaluation of WMP performance and risk analysis. SCE also has higher levels of historical data for ignitions within in its HFRA.

SCE requests that Energy Safety provide detail and clarification on the proposed requirements related to ignition information, such as “Local conditions at the time ignition occurred” and “Local conditions (forecasts) at the time ignition occurred”. SCE suggests Energy Safety work collaboratively with the utilities to improve the clarity associated with these proposed data requirements, including discussions about what data (especially regarding forecasts) is available.

5 MATURITY MODEL

While the maturity model may prove useful as a high-level roadmap and mechanism for cross-IOU benchmarking, it is not clear that the scoring metrics will directly result in a reduction in associated risk as envisioned in the draft guidelines.

SCE has found the maturity model is useful in tracking advancement of activities and identifying areas of opportunity for the utility, and SCE supports most of the enhancements and assessments suggested in the workshop. SCE provides several high-level suggestions and observations below, and then addresses each of the “key changes” introduced at the workshop. SCE also requests the opportunity to provide additional feedback as the guidelines for the maturity model are being developed.

First, the maturity model should not be mistaken as a direct indicator of a reduction in wildfire risk. For example, it is not clear how additional automation can be directly translated to improved prioritization, or a reduction in ignitions and/or consequences in and of itself. Put another way, changes to the model should consider ways to more clearly indicate the benefit or value of advancing within each category. SCE also notes that improvement in maturity model areas may need to be prioritized. Improvement in one area may be important in the immediate WMP period, while improvement in a separate area may be appropriate to defer to a future WMP period.

Second, although the materials indicate the model is “Not intended to evaluate compliance”,²⁴ SCE is concerned that the direction indicated in the workshop materials suggests a future in which WMP compliance may be linked to maturity scores.

Third, changes should avoid making the questions or scoring process overly complicated and difficult for respondents to understand. While making the model more objective and quantified is a reasonable goal, Energy Safety should recognize the limits of quantification for a topic that is inherently subjective and qualitative. A well-designed survey should require minimal explanation to the respondent or a reviewer of the results. Clarity in definitions, purpose and intent will improve the ability of the utilities to administer the survey with improved consistency in survey responses.

²³ *Id.* at Slide 66.

²⁴ *Id.* at Slide 81.

Below SCE responds to the five key changes²⁵ presented in the workshop materials:

5.1 Key Change #1: Reorganize The Maturity Model Into Nine Categories Covering Forty-Five Capabilities

SCE supports the addition and/or removal of capabilities if the changes better reflect activities important to mature wildfire mitigation initiatives. SCE notes that substantial changes to the model and scoring process could make it challenging to compare progress to prior years. SCE recommends Energy Safety provide a matrix that will map new capabilities and allow for scoring continuity. It is SCE's understanding that, depending on the extent of changes to categories and definitions, some responses or maturity areas from prior years may not map to the new model.

5.2 Key Change #2: Expand Maturity Capability Definition

SCE agrees that the "technical basis of capabilities and how they relate to risk reduction could be more clear."²⁶ Maturity scores should not be conflated with Energy Safety's evaluation of the design and implementation of the wildfire mitigation activities themselves. Establishing links between increasing maturity levels and reduced risk could provide a false assurance of successful outcomes²⁷, and should be limited to cases in which a direct link between high maturity and successful risk reduction can be established without dispute. Wildfire risk will be mitigated and assessed through specific mitigation activities, not by "maturity" per se.

5.3 Key Change #3: Develop Cross-Category Theme Metrics Which Evaluate Key Scoring Philosophies Across All Categories

SCE advises against engineering a level of complexity in the maturity model that is difficult for stakeholders and respondents to understand, that creates a false sense of precision, and that confuses measurement of maturity with measurement of risk reduction. For example, in the workshop session describing the changes to the maturity model, SCE left with more questions than answers about its construct, methodology, and uses going forward. While SCE understands the intention behind the cross-category scoring approach described in the materials,²⁸ SCE suggests that such cross-category scoring is at best a data point reflecting the unique characteristics of how the survey is structured, defined and interpreted.

5.4 Key Change #4: Increased Transparency In Maturity Level Determination

SCE supports increasing the transparency in maturity assessment and providing well-documented criteria to determine maturity levels.²⁹

²⁵ *Id.* at Slide 90.

²⁶ *Id.* at Slide 87.

²⁷ *Id.* See, "documenting the link between improving maturity and a reduction in wildfire risk for each capability" and "documenting the outcomes which are expected to be impacted by improved maturity in each capability" on Slide 92. Also see "Establish outcomes which are expected to be affected by increased maturity" on Slide 96.

²⁸ *Id.* at Slides 108-110.

²⁹ *Id.* at Slide 89.

5.5 Key Change #5: Link Maturity Assessment To Utility WMP Discussion And Improving Best Practices

SCE understands the desire to increase the integration of the maturity assessment within the WMP but recommends that the primary focus of the WMP continues to be mitigation activities, not maturity of activities. The workshop materials state that:

“Add a section within each subject matter chapter on maturity assessment for the utility to describe how the initiatives are expected to advance their maturity and reach the levels projected for future years”³⁰

“Provide space for utilities to describe efforts undertaken in each capability which are expanding the state-of-the-art that are not captured in the existing maturity level definitions for potential inclusion in the 2026 update”³¹

The intention of mitigation initiatives is to reduce wildfire risk. Adding a section for a utility to describe how an initiative is “expected to advance their maturity” incorrectly dilutes the focus from risk reduction to maturity advancement. It establishes a problematic bias that utility efforts should focus on maturity advancement, which may neither be a prudent or necessary use of customer resources. Additionally, as noted above, improvements may need to be prioritized if they are not critical for the current WMP period.

As SCE has stated above, while maturity is an appropriate data point and proxy for understanding a utility’s ability to successfully mitigate wildfire risk, maturity is subordinate to the goal for mitigation program design and execution and could become a distraction from the purpose of the WMP. Rewarding increased maturity scores can incorrectly direct resources toward advancement of maturity instead of advancement of mitigation activities.

CONCLUSION

SCE appreciates the opportunity to submit these comments on the 2023 WMP Guidelines.

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

Sincerely,

//s//

Michael A. Backstrom
VP Regulatory Affairs
Southern California Edison

³⁰ *Id.* at Slide 113.

³¹ *Id.* at Slide 113.