

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Office of Energy Infrastructure Safety
Natural Resources Agency

**COMMENTS OF THE GREEN POWER INSTITUTE ON THE
OEIS DRAFT EVALUATION OF SDG&E'S 2022 WMP UPDATE**

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COMMENTS OF THE GREEN POWER INSTITUTE ON THE OEIS DRAFT EVALUATION OF SDG&E'S 2022 WMP UPDATE

The Green Power Institute (GPI), the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security, provides these *Comments of the Green Power Institute on the OEIS Draft Evaluation of SDG&E's 2022 WMP Update*.

GPI greatly appreciates the efforts of Energy Safety in issuing a comprehensive draft decision and format that includes extensive data review and supporting figures. We also appreciate the alignment of 2022 WMP Update content review and maturity model status in the IOU Draft Decisions. We provide comments on the following aspects of the SDG&E 2022 WMP Draft Decision:

- The SDG&E Draft Decision largely looks to establish expectations for 2023 WMP filings and the next 3-year WMP cycle.
- The independent expert assessment on SDG&E's risk reduction impact assessment tool should be publicly available.
- Risk Assessment and Mapping Maturity Survey responses regarding confidence level need to be substantiated by the utility and confirmed by Energy Safety and/or an independent evaluator.
- GPI supports the requirement to evaluate and incorporate risk from wildfires that burn longer than 8 hours. We recommend expanding this issue/requirement to also incorporate risk from PSPS events that last longer than 8 hours.
- The Utilities should perform an assessment of wildfire consequence modeling limitations in developed "unburnable" locations and whether additional considerations are needed to quantify wildfire consequence in developed locations.
- GPI supports SDGE-22-18 but recommends providing additional guidance regarding how SDG&E should classify equipment failure risk events that ensure risk event classifications are consistent between the utilities.

- Expand SDGE-22-20 Progression of Effectiveness of Enhanced Clearances Joint Study to include an evaluation and cost benefit analysis of line-to-sky vegetation clearing practices.
- GPI supports the proposed scoping meetings and recommends providing additional guidance regarding meeting timing.

The SDGE Draft Decision largely looks to establish expectations for 2023 WMP filings and the next 3-year WMP cycle

We agree with the pronouncement to focus this draft decision on:

...the progress the utility made over the three-year plan cycle and whether the utility matured in its understanding of its own wildfire ignition risks and appropriate mitigation activities to decrease those risks (SDG&E Draft Decision, p. 6).

Compared to previous decisions approving, conditionally approving, or denying WMPs, this decision caps the present 3-year WMP cycle. It is therefore reasonable to focus on progress to-date with a forward view to whether and which capabilities require substantial, incremental improvements in the forthcoming 3-year 2023 WMP cycle. Accordingly, 26 of the total 31 identified areas for continued improvement listed in Section 7, “List of Utility Areas for Continued Improvement and Required Progress,” require SDG&E to address the issue in their 2023 3-year WMP (Table 1). We generally agree with the decision to forward the majority of Issue/Requirement conditions to the 2023 WMP filings given these filings are due in Q1 2023. Some of these conditions will require SDG&E to prepare either updated or new methods (e.g. SDGE-22-04 Inclusion of Community Vulnerability in Consequence Modeling) that are reasonable to scope for the next 3-year WMP cycle.

For Issues SDGE-22-12 and 13, GPI recommends establishing a clear deadline for reporting on issue progress. For these issues the “required progress” is rolled into the continued covered conductor study established in the 2021 Action Statements. GPI recommends requiring, or clarifying, an annual progress report in the WMP filings beginning in the 2023 WMP. Without a regular reporting schedule established in the

decisions and for the upcoming 3-year WMP cycle we are concerned that progress may stall or remain unreported.

Transparency into, and action towards many of the Issue/Requirement areas could be improved upon through updated top-down WMP templates and guidelines. For example, SDGE-22-25 “Validation of Vegetation Risk Index” and other issues requiring model validation or transparency could be initially improved upon by establishing clearer expectations for comprehensive descriptions of existing and planned model verification and validation methods as well as summaries of the results of those methods. GPI recommends reviewing all IOU and SMJU Issues/Requirements with an eye towards how both WMP requirements and information gaps are playing a role in each issue, and whether planned WMP filing template and guidance updates can close these gaps. For example, the Energy Safety proposal to require comprehensive version-controlled model documentation as WMP attachments that include model verification and validation methods and outcomes would set a standard for having these methods in place. Utility responses would then provide a basis on which to review whether a method existed and whether existing methods are adequate. Updated reporting standards informed by WMP Decision Issues/Requirements areas could accelerate WMP quality beyond the basic need to require foundational model evaluation and instead focus on reviewing whether the method is adequate and how models can be improved. GPI considers this a top-down approach that will encourage utilities to close WMP methodological and information gaps in addition to draft decision issue/requirement areas.

Table 1. SDGE Draft Decision Section 7 List of Utility Areas for Continued Improvement and Required Progress by date of requirement.

No Date	2022	2023
<ul style="list-style-type: none"> • SDGE-22-12 • SDGE-22-13 	<ul style="list-style-type: none"> • SDGE-22-02 • SDGE-22-04 • SDGE-22-05 • SDGE-22-06 	<ul style="list-style-type: none"> • SDGE-22-01 • SDGE-22-03 • SDGE-22-06 • SDGE-22-07

		<ul style="list-style-type: none">• SDGE-22-08• SDGE-22-09• SDGE-22-10• SDGE-22-11• SDGE-22-14• SDGE-22-15• SDGE-22-16• SDGE-22-17• SDGE-22-18• SDGE-22-19• SDGE-22-20• SDGE-22-21• SDGE-22-22• SDGE-22-23• SDGE-22-24• SDGE-22-25• SDGE-22-26• SDGE-22-27• SDGE-22-28• SDGE-22-29• SDGE-22-30• SDGE-22-31
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The independent expert assessment on SDG&E's risk reduction impact assessment tool should be publicly available

With respect to risk assessment and mapping Maturity Survey Responses the Draft Decision states, “SDG&E’s ignition risk reduction impact assessment tool is assessed by an independent expert and supported by historical incidents and events (SDG&E 2022 WMP Draft Decision, p. 32).” This independent evaluator assessment should be made publicly available if it is not already.

Risk Assessment and Mapping Maturity Survey responses regarding confidence level must be substantiated by the utility and confirmed by Energy Safety and/or an independent evaluator.

With respect to SDG&E’s risk assessment and mapping maturity survey, the draft decision notes the following:

Areas limiting SDG&E’s progress in maturity include the following:

- SDG&E has a confidence level of greater than 80 percent—not yet greater than 90 or 95 percent—for its wildfire risk assessments. However, SDG&E’s confidence level has increased from greater than 60 percent since 2021.
- SDG&E’s risk reduction impact estimations do not include a quantitative confidence interval (SDG&E 2022 WMP Draft Decision, p. 32).

SDG&E must provide quantitative evidence of, and describe how they certified the confidence of their wildfire risk assessments at a level greater than 80 percent. This should be required for all “wildfire risk assessments” including probability of ignition and consequence models. This progress should also be substantiated by Energy Safety and/or an independent evaluator.

GPI supports the requirement to evaluate and incorporate risk from wildfires that burn longer than 8 hours. We recommend expanding this issue/requirement to also incorporate risk from PSPS events which can also last longer than 8 hours.

SDGE-22-06 “Eight-hour fire spread simulations” requires SDG&E to account for wildfire risk that occurs past the 8-hour timeframe. GPI strongly supports this requirement.

Utility WMPs also referred to using the same 8-hour timeframe for PSPS events to incorporate PSPS consequence risk as a parallel to the 8 h burn time used in the wildfire consequence risk component. GPI recommends expanding SDGE-22-06, or adding an additional issue area, that requires the utilities to incorporate the risk from PSPS events that last longer than 8 hours. Risk over time during PSPS events is unlikely to be linear and may explode the longer an event persists. For example, damages to individuals and businesses may be minimal if a PSPS event only lasts a couple hours, whereas longer than 8-hour events that may extend beyond the duration of backup battery support could result in much more substantial hardship, health impacts, and fiscal losses.

The Utilities should perform an assessment of wildfire consequence modeling limitations in developed “unburnable” locations and whether additional considerations are needed to quantify wildfire consequence in developed locations.

During the Small Multi-Jurisdictional Utility (SMJU) workshop on the 2022 WMP Updates the issue came to light that wildfire spread model limitations include modeling wildfire spread in developed locations that are deemed unburnable land. It is well known that wildfires can spread into developed communities. GPI recommends establishing an issue/requirement area that requires utilities to report on the limitations of wildfire spread models and resultant consequence quantification in developed locations. All utilities should also provide a description of how they account for known wildfire spread model limitations in their consequence quantification and mitigation planning.

GPI supports SDGE-22-18 but recommends providing additional guidance regarding how SDG&E should classify equipment failure risk events that ensure risk event classifications are consistent between the utilities.

We support the requirement that SDG&E refine the classification of equipment failures categorized as “other”. GPI recommends strengthening the language in the draft decision that states:

SDG&E should re-consider the “other” category, including what equipment failures fall under it, specifically in terms of whether these failures might fit better under a different category to accurately represent the failure (SDG&E 2022 WMP, p. 59).

As explained in the Draft Decision, SDG&E data includes equipment specific causes for wire-down events listed as “other.” Directing SDG&E to “re-consider” the other category is inadequate and does not promote standardized risk event reporting. Failure to improve risk event reporting standardization across utilities will hinder cross-comparisons of mitigation effectiveness. Equipment failure sub-categories in WMP Table 7.1 also provide insight into the risk-event sub-causes that can be mitigated by the utilities (e.g. though design), versus upstream risk-event causes such as weather that cannot be controlled and that can cause multiple risk event and equipment failure types. We recommend updating the language on p. 59 and requirements in SDGE-22-18 to *require* SDG&E to re-classify risk-events under equipment/facility failure sub-cause “other” into the equipment specific sub-categories to the extent possible. The draft decision should also clarify the definition of “other” – for example, “other” refers to other equipment failure modes not otherwise listed as a sub-cause and risk events should not be classified based on upstream environmental risk drivers such as wind, ice loading, lightening etc. As a parallel, wire down events with the cause contact from object and sub-cause vegetation contact (Table 7.1, 1.a) can also occur due to weather related drivers (e.g. wind). However, this would not justify classifying a vegetation contact risk event as sub-cause “Other contact from object” (1.e) if weather/wind was involved.

SDGE-22-18 should establish a clear definition for how to properly classify equipment/facility failure risk events and causes in WMP table 7.1 and 7.2 and should

require that SDG&E and all utilities follow the defined classification method. This will improve WMP standardization and evaluation. SDG&E should not be permitted to create their own methodology for categorizing risk events with equipment failure causes that includes “sub-sub-causes” under the sub-cause other (e.g. WMP Table 7.1 2.h); unless they can justify the need to add equipment/facility failure sub-cause modes that align with the existing WMP Table 7.1 classification method and provide added value.

Expand SDGE-22-20 Progression of Effectiveness of Enhanced Clearances Joint Study to include an evaluation and cost benefit analysis of line to sky vegetation clearing practices.

The SMJU workshop on the 2022 WMP raised questions regarding whether line-to-sky vegetation clearing may result in increased tree mortality and the overall cost-benefit of the practice in terms of reducing wildfire risk. GPI recommends expanding SDGE-22-20 and the Effectiveness of Enhanced Clearances Joint Study to specifically require a cost-benefit assessment of line-to-sky clearing practices including whether it could result in an increase in dead or dying trees that in turn increase wildfire risk (e.g. via contact from vegetation including branches and strike trees).

GPI supports the proposed scoping meetings and recommends providing additional guidance regarding meeting timing.

The SDG&E 2022 WMP Draft Decision requires three scoping meetings prior to the 2023 WMP filing:

SDGE-22-02. Collaboration and Research in Best Practices in Relation to Climate Change Impacts and Wildfire Risk and Consequence Modeling. ... Required Progress: Prior to the submission of their 2023 WMPs, all electrical corporations (not including independent transmission operators) must participate in an Energy Safety-led scoping meeting to discuss how utilities can best learn from each other, external agencies, and outside experts (SDGE 2022 WMP Draft Decision, pp. 108-109).

and

SDGE-22-04 Inclusion of Community Vulnerability in Consequence Modeling...Required Progress: Prior to the submission of their 2023 WMPs, all

electrical corporations (not including independent transmission operators) must participate in an Energy Safety-led scoping meeting to discuss how to best learn from each other, external agencies and outside experts (SDG&E 2022 WMP Draft Decision, p. 109).

and

SDGE-22-22. Participation in Vegetation Management Best Management Practices Scoping Meeting...Required Progress: Prior to the submission of their 2023 WMPs, SDG&E and all other electrical corporations (not including independent transmission operators) must participate in an Energy Safety-led scoping meeting to discuss how utilities can best learn from each other and future topics to explore regarding vegetation management best management practices for wildfire risk reduction (SDG&E 2022 WMP Draft Decision, p. 117).

GPI recommends providing additional guidance in the draft decisions regarding when the scoping meetings should take place, such as a specific quarter or month. Insight from these meetings may inform the proposed 2023 WMP guidelines and template updates. For example, whether additional reporting requirements, data tables, or maturity model rubrics are needed to update best-practice expectations and capture progress towards best practices. The outcomes of these scoping meetings could also expand the purview of WMP expectations and should therefore take place long enough before the 2023 WMP filings in order to ensure that utilities can incorporate scoping meeting outcomes and updated expectations in the next 3-year WMP cycle. We recommend requiring that these scoping meetings occur shortly after draft decisions are issued for the SMJUs. Scoping meetings that address risk modeling should take place after a risk modeling working group report is issued and should be designed to address both IOU and SMJU risk models.

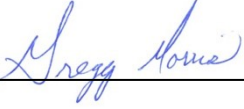
Conclusions

GPI generally supports the Draft Decision on SDG&E's 2022 WMP, including the decision to approve the 2022 plan with 31 issues/requirements that SDG&E must address in 2022 or in the 2023 WMP. We recommend the aforementioned adjustments in order to further strengthen the final decision and in preparation for the next 3-year WMP cycle beginning in 2023.

We urge the OEIS to adopt our recommendations herein.

Dated June 3, 2022

Respectfully Submitted,



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