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Via Electronic Filing

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**Subject: Comments of the Public Advocate's Office on the Draft Decision
Approving SDG&E's 2022 Wildfire Mitigation Plan Update**
Docket: 2022-WMPs

Dear Director Thomas Jacobs,

The Public Advocate's Office (Cal Advocates) at the California Public Utilities Commission (CPUC) respectfully submits the following comments on the Draft Decision of the Office of Energy Infrastructure Safety (Energy Safety) approving San Diego Gas & Electric Company's (SDG&E) 2022 Wildfire Mitigation Plan Update. We respectfully urge Energy Safety to adopt the recommendations discussed herein.

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I. INTRODUCTION

On February 11, 2022, San Diego Gas & Electric Company (SDG&E) submitted its annual wildfire mitigation plan (WMP) update for 2022. On April 11, 2022, Cal Advocates and other stakeholders submitted formal comments on the WMPs of SDG&E¹ and other large utilities.² On April 29, 2022, Energy Safety issued an extension of the evaluation period, which deferred publication of a draft decision on SDG&E's 2022 WMP from May 12, 2022 to May 19, 2022.³

On May 19, 2022, Energy Safety issued its Draft Decision, which contains its *Draft Evaluation of 2022 Wildfire Mitigation Plan Update: San Diego Gas & Electric Company*. Pursuant to the Draft Decision and to the *Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines (2022 WMP Guidelines)*,⁴ stakeholders may submit comments on the Draft Decision by June 8, 2022.

In these comments, Cal Advocates makes the following recommendations:

- Energy Safety should require SDG&E to show that its significant planned increase in system hardening in 2022 is feasible.
 - Energy Safety should direct SDG&E to submit a detailed system hardening workplan within 30 days of Energy Safety's final action statement on SDG&E's 2022 WMP Update.
 - Energy Safety should direct SDG&E to continue reporting on its system hardening progress as part of each WMP quarterly report for 2022.
 - Energy Safety should also require SDG&E to submit a similarly detailed workplan for system hardening as part of its 2023 WMP submission.
- Energy Safety should require SDG&E to explain in future WMPs how it uses in-house and contract labor in vegetation management programs.

¹ *Comments of the Public Advocate's Office on the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities*, Docket 2022-WMPs, April 11, 2022, pp. 42-48.

² *Comments of the Public Advocate's Office on General Issues in the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities*, Docket 2022-WMPs, April 11, 2022.

These comments use the more common terms "utility," "investor-owned utility," or "IOU" and the phrase "electrical corporations" interchangeably to refer to the entities that must comply with the wildfire safety provisions of the Public Utilities Code.

³ Energy Safety, *Extension of the evaluation timeframe for San Diego Gas & Electric Company's 2022 Wildfire Mitigation Plan Update*, Docket 2022-WMPs, April 29, 2022.

⁴ Energy Safety, *Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines*, Docket 2022-WMPs, December 15, 2021. See Attachment 5: Guidelines for Submission and Review of 2022 Wildfire Mitigation Plan Updates, pp. 5-6.

- Energy Safety should direct SDG&E to collaborate with other large IOUs to develop best practices for fast recloser settings.
 - Energy Safety should revise the Draft Decision to direct SDG&E to participate in a working group on fast recloser settings and data reporting prior to the 2023 WMPs.
 - Energy Safety should also require SDG&E (as well as other large utilities) to begin reporting, in its WMP quarterly reports, on the number and impact of customer outages caused by fast recloser settings
- Energy Safety should provide specific direction to SDG&E on how to improve its modeling of wildfire and PSPS risks.
 - SDG&E should document the sensitivity analyses it performs for these models and report on the results.
 - SDG&E should report on its validation methods for both WiNGS-Ops and WiNGS-Planning models.
 - Energy Safety should direct SDG&E to demonstrate that its WiNGS-Ops and WiNGS-Planning models use reasonable estimates of the harms to customers from PSPS events.

II. Grid Design and System Hardening

A. Energy Safety should require SDG&E to show that its significant planned increase in system hardening in 2022 is feasible.

Energy Safety's Draft Decision does not address the issue of whether SDG&E's plan to significantly increase its system hardening work in 2022 is feasible. Energy Safety should revise the Draft Decision to require SDG&E to show that its system hardening targets are achievable.

SDG&E is expanding its use of covered conductor installation and undergrounding for wildfire mitigation in 2022. SDG&E has set a target of installing 60 of covered conductor miles in 2022.⁵ In addition, SDG&E has set a target of undergrounding 65 miles in 2022.⁶ However, in the previous two years *combined* it has only completed 22 miles of covered conductor installation, and 41 miles of undergrounding, respectively.⁷⁻⁸

⁵ Energy Safety's 2022 Draft Decision Approving SDG&E's WMP (Draft Decision), Table 4.6.3.1: SDG&E Grid Hardening Completion and Targets (2021-2022), p. 44.

⁶ Draft Decision, Table 4.6.3.1: SDG&E Grid Hardening Completion and Targets (2021-2022), p. 44.

⁷ SDG&E's 2022 WMP, Attachment B, Table 12. For the covered conductor installation calculation, see non-spatial data Table 12 and add the following: Line 27 Cell AF + Line 27 Cell AM.

⁸ SDG&E's 2022 WMP, Attachment B, Table 12. For the undergrounding installation calculation,

Table 1			
SDG&E's System Hardening Work, 2020 – 2022			
Work outputs in miles			
	2020 actual output	2021 actual output	2022 target output
Covered conductor	1.9	20	60
Undergrounding	15.5	26	65

As Table 1 shows, SDG&E's history of system hardening calls into question its ability to reach its targets in 2022.

Simultaneous with its increased covered conductor installation, SDG&E is planning to increase its rate of undergrounding far beyond the level it was able to achieve in 2021. Taken together, two system hardening goals will require substantially more resources and staffing, as well as planning and design work in advance of construction. Unfortunately, SDG&E has provided little to no detail to show that its 2022 system hardening goals are realistic and or achievable.

The Draft Decision notes that SDG&E plans on meeting its covered conductor installation goal "by reallocating some of its resources previously focused on traditional hardening."² However, this brief statement does not speak to the feasibility of SDG&E's system hardening proposals. Neither the Draft Decision nor SDG&E's WMP demonstrate that SDG&E has considered or addressed the likelihood of supply constraints of the needed resources.

To ensure that SDG&E achieves its wildfire mitigation goals promptly and uses its resources efficiently, Energy Safety should require additional reporting that demonstrates in greater detail how SDG&E's covered conductor and undergrounding goals are feasible. Specifically, Energy Safety should take the following three actions.

First, Energy Safety should direct SDG&E to submit a detailed system hardening workplan within 30 days of Energy Safety's final action statement on SDG&E's 2022 WMP Update. Energy Safety should direct SDG&E to explain how it plans to optimize and reallocate its resources to complete its covered conductor and undergrounding goals. Energy Safety should also require SDG&E to detail how it has addressed supply constraints and other foreseeable challenges that the utility has identified as likely barriers to SDG&E completing its significant increase in covered conductor installation and undergrounding goals for 2022. This requirement should not be burdensome since SDG&E should have this information

see non-spatial data Table 12 and add the following: Line 43 Cell AF + Line 43 Cell AM.

² Draft Decision, p. 43.

available as a matter of course; considering foreseeable obstacles should be a routine element of program planning.

Second, Energy Safety should direct SDG&E to continue reporting on its system hardening progress as part of each WMP quarterly report for 2022. If SDG&E falls behind its workplan, its quarterly reports should explain what adjustments it is making to reach the year-end targets.

Finally, Energy Safety should also require SDG&E to submit a similarly detailed workplan for system hardening as part of its 2023 WMP submission.

III. VEGETATION MANAGEMENT

A. Energy Safety should require SDG&E to explain in future WMPs how it uses in-house and contract labor in vegetation management programs.

Each utility should explain clearly in its WMP which of its vegetation management programs rely on contractors and which rely on utility personnel. As Cal Advocates discussed in our 2022 WMP comments, in-house and contract labor each have advantages and disadvantages.¹⁰ Understanding how utilities are using contract and in-house labor will enable intervenors to assess the strengths and weaknesses of vegetation management programs, as well as better understand how SDG&E's vegetation management programs operate and identify which type of labor is most appropriate for each individual program.

However, Energy Safety's Draft Decision does not address the question of how in-house and contract labor are used in vegetation management programs. For its 2023 WMP filing, Energy Safety should require SDG&E to provide a showing clearly laying out which vegetation management programs use contract and in-house labor, in what proportions that labor is employed, and the reasoning behind its staffing decisions. Additionally, SDG&E should specifically examine and report on whether the current structure of its vegetation management quality control (QC) program is providing sufficient oversight. Requiring this information from SDG&E will create a comparable set of data across all utilities on the vegetation management staffing.

¹⁰ *Comments of the Public Advocate's Office on the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities*, Docket 2022-WMPs, April 11, 2022, pp. 40-42; *Comments of the Public Advocate's Office on General Issues in the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities*, Docket 2022-WMPs, April 11, 2022, p. 13.

IV. GRID OPERATIONS AND PROTOCOLS

A. Energy Safety should direct SDG&E to collaborate with other large IOUs to develop best practices for fast recloser settings.

Energy Safety's Draft Decision does not address the need to develop consistent practices for fast recloser settings across the three large utilities. As Cal Advocates discussed in our comments on the large utilities' 2022 WMPs, the three large utilities agree that fast recloser settings prevent ignitions, and thus are especially valuable in times and places with a high risk of catastrophic wildfires. However, different outcomes between the utilities suggest that there is room for improvement about how best to fine-tune these settings.¹¹

Energy Safety should revise the Draft Decision to direct SDG&E to participate in a working group on fast recloser settings and data reporting prior to the 2023 WMPs.¹² Energy Safety should convene this working group with the aim of bringing the practices of the three utilities into alignment and developing best practices for consistent and best results. Each utility should report on the results of this working group in its 2023 WMP, or in a separate submission prior to the 2023 WMP.

Energy Safety should also require SDG&E (as well as other large utilities) to begin reporting, in its WMP quarterly reports, on the number and impact of customer outages caused by fast recloser settings (in a manner similar to current reporting on PSPS outages).¹³ As part of the working group process, Energy Safety should set standards on quarterly data reporting about fast recloser settings and outages.

SDG&E's participation in this collaborative effort on fast recloser settings is vital, since all three large utilities need to participate to achieve the goals of sharing knowledge, identifying best practices, and developing comparable data. Receiving data from the three large utilities in the same format would allow stakeholders to review data, making for easier comparison and analysis.

¹¹ *Comments of the Public Advocate's Office on General Issues in the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities*, Docket 2022-WMPs, April 11, 2022, p. 15.

¹² The working group at the minimum should include Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and SDG&E, and should be open to participation by small utilities.

¹³ *Comments of the Public Advocate's Office on General Issues in the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities*, Docket 2022-WMPs, April 11, 2022, pp. 15-17.

V. RISK ASSESSMENT AND PUBLIC SAFETY POWER SHUTOFFS (PSPS)

A. Energy Safety should provide specific direction to SDG&E on how to improve its modeling of wildfire and PSPS risks.

Energy Safety’s Draft Decision directs SDG&E to report on the performance of its wildfire risk models, particularly with respect to decision-making about PSPS events;¹⁴ however, it does not provide specific direction on how to improve SDG&E’s modeling of wildfire and PSPS risk. The Draft Decision requires additional reporting on the Wildfire Next Generation System – Operations (WiNGS-Ops) and Wildfire Next Generation System – Planning (WiNGS-Planning) models. Directive SDGE-22-31 (“Improvements to the WiNGS-Ops and WiNGS-Planning Models”) states:

Required Progress: In its 2023 WMP, SDG&E must provide a progress report on the performance of WiNGS-Ops as used in its 2022 PSPS decision-making process, including successes, issues encountered, and lessons learned.

- In particular, SDG&E must include in its report the progress it made prior to September 1, 2022, in incorporating WiNGS-Ops in the PSPS decision-making process.
- SDG&E must also report any progress it made on incorporating PSPS risk reduction quantification to include customers impacted by sectionalizing and resiliency programs through the WiNGS-Planning model.¹⁵

This requirement appears to be aimed at improving PSPS decision-making and increasing transparency about the performance of modeling tools. Cal Advocates supports both goals. However, this directive would benefit from greater specificity. Energy Safety should revise the Draft Decision to include specific requirements.

First, Cal Advocates recommends adding clear reporting requirements to demonstrate the performance of the WiNGS-Ops and WiNGS-Planning models. First, SDG&E should document the sensitivity analyses it performs for these models and report on the results. SDG&E acknowledges that WiNGS-Ops is in an early stage of development, with no clear methods for verification and validation. SDG&E further notes that sensitivity analyses on WiNGS-Ops are being conducted, with results benchmarked to past decisions to determine areas of improvement and whether the quantifications are adequate.¹⁶ Because SDG&E indicates that development and comparison of performance metrics is ongoing, SDG&E should be required to report this information in its 2023 WMP or sooner.

¹⁴ Draft Decision, p. 121.

¹⁵ Draft Decision, p. 121.

¹⁶ SDG&E 2022 WMP Update, p. 133.

Second, SDG&E should report on its validation methods for both WiNGS-Ops and WiNGS-Planning models. For example, SDG&E should describe any back-casting exercises done to validate the performance of the models, as well as describe any comparisons with the outputs of previous iterations of SDG&E's PSPS decision-making models. In reporting on these validation exercises, SDG&E should report on where the new model produces different outputs from older models, and how these differences would affect the frequency and scope of PSPS events.

Finally, Energy Safety should direct SDG&E to demonstrate that its WiNGS-Ops and WiNGS-Planning models use reasonable estimates of the harms to customers from PSPS events. As Cal Advocates observed in our 2022 WMP comments, SDG&E's PSPS modeling relies on an implausibly low estimate of the customer harms of PSPS events.¹⁷ In its 2023 WMP submission, SDG&E should clearly state which types of harms or risks to customer are included in its current PSPS models and explain how it derived its estimates of those harms. Energy Safety should require SDG&E to show that its estimates are reasonable and empirically supported.

In sum, Energy Safety should clarify and strengthen directive SDGE-22-31. By providing more specific direction, Energy Safety can better achieve the goals of improving PSPS decision-making and ensuring that modeling tools perform well for their intended functions.

VI. CONCLUSION

Cal Advocates respectfully urges Energy Safety to adopt the recommendations discussed herein. For any questions relating to these comments, please contact Henry Burton (Henry.Burton@cpuc.ca.gov).

Respectfully submitted,

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¹⁷ *Comments of the Public Advocate's Office on General Issues in the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities*, Docket 2022-WMPs, April 11, 2022, pp. 20-21.