Gary Chen
Director
Safety & Infrastructure Policy

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E-filed Docket # 2022-GIS-DRS

Stephen P. Lai
Data Manager, Data Analytics Division
Office of Energy Infrastructure Safety
715 P Street 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Comments on GIS Data Reporting Standard Version 2.2 Draft Guidelines

Dear Mr. Lai,

Southern California Edison Company (SCE) appreciates the revisions made by the Office of Energy Infrastructure Safety (Energy Safety) to its Geographic Information Systems Data Standard Guidelines (GIS Data Standard) and the opportunity to provide comments. SCE provides the following factual and technical comments regarding the May 9, 2022 reissuance of the GIS Data Standard Version 2.2.

SCE SUPPORTS TECHNICAL WORKSHOPS ON IMPLEMENTING THE GIS DATA STANDARD AND RECOMMENDS PAUSING SEVERAL REQUIREMENTS TO BE FURTHER VETTED AT THESE WORKSHOPS

SCE appreciates Energy Safety rescheduling technical workshops after each quarterly submission and recommends these workshops continue in perpetuity. SCE also recommends that Energy Safety conduct two or three workshops after each quarter (at least through 2022) as there are still several challenging requirements and issues to discuss. SCE recommends future workshops discuss 1) requirements that utilities have not yet been able to meet and the costs, impacts, and benefits of meeting these requirements, 2) metadata, related tables and a process for resubmitting the geodatabase when errors are found, 3) the requirement for wildfire initiative target units reported in the Quarterly Initiative Update (QIU) and Wildfire Mitigation Plan (WMP) to match the geometry of the data included in the geodatabase and 4) improvements to the quarterly reports such as reporting out year-to-date results and bifurcating recorded results and forecast information. These are further discussed below.

For some requirements, SCE believes the costs and impacts to implement likely outweigh the benefits and should be modified or removed. For example, the GIS Data Standard has requirements to submit hundreds of thousands of photos.[1] In several instances, SCE's business processes do not currently include photo capture as part of the workflow. For example, SCE does not currently capture photos for some vegetation

[1] GIS Data Standard at pp. 11-13.

management (VM) projects nor grid hardening projects. The photo requirements for these are also burdensome, would be costly to implement, and Energy Safety has not described how the benefits of these requirements outweigh the costs. For VM projects, the GIS Data Standard requires that for each project point, a before and after photo be captured.[2] In SCE's Q1 2022 QDR, we included 80,151 VM project points. The VM Project Photo requirement would thus amount to capturing, naming, storing, and submitting approximately 640,000 photos on an annual basis. Likewise, the grid hardening and vegetation inspection photo requirements include before and after photos of spans and where inspections reveal issues, respectively. These photo requirements would also be in the tens of thousands of photos annually. Given the large cost and impacts to implement these photo requirements, SCE recommends Energy Safety pause these requirements and discuss the costs and benefits at an upcoming workshop.

Energy Safety should hold another workshop to discuss metadata, related tables and a process for resubmissions. SCE has not completed the metadata requirements in the GIS Data Standard and has previously recommended these requirements be paused until the GIS Data Standard is further resolved. While SCE anticipates populating metadata beginning with the Q1 2023 submission, it would be helpful to discuss approach and prioritization with Energy Safety, the IOUs, and stakeholders. SCE also believes a discussion on the architecture of related tables is warranted given the large amounts of data and sources of information. SCE further recommends that a process be established to allow utilities to resubmit the geodatabase should errors be found. Thresholds for the type and amount of changes, timelines, case docket, and other necessary steps for resubmission could be established. These issues can be discussed at an upcoming workshop.

In SCE's December 27, 2021 comments on this GIS Data Standard, we described why progress on initiative targets reported in the QIU and Quarterly Notification should continue to be based on best available information and not based solely on geospatial data.[3] Additionally, some wildfire initiatives, such as SCE's Microgrid Assessment (SH-12) and Rapid Earth Fault Current Limiter (SH-17), rely on qualitative evidence as opposed to geometry and cannot be transformed into the GIS Data Standard schema. Given these factual and technical constraints, SCE recommends Energy Safety pause this requirement to base targets solely on geospatial data and discuss with utilities and stakeholders as part of a workshop because this requirement would underreport actual progress of wildfire initiatives.

Based on lessons learned, SCE recommends a workshop be conducted on improvements to the quarterly reports such as reporting out year-to-date results and bifurcating recorded results and forecast information. SCE believes the quarterly reports should report on the wildfire initiative goals outlined in the WMP. The WMP is the proper vehicle for utilities to present their wildfire mitigations and annual targets. The quarterly reports should thus provide a status on those wildfire mitigation targets and not include additional work planning forecasts. Requiring utilities to report quarterly on planned

[2] GIS Data Standard at p. 12.

[3] *See* SCE's December 27, 2021 Comments on Draft GIS Data Reporting Standard Version 2.2 at pp. 2-3.

work geospatially is not consistent with utilities' work management systems, should be paused, and discussed at an upcoming workshop. The quarterly reports could also benefit with reporting out year-to-date data as opposed to quarterly data. These and other improvement opportunities should be discussed at an upcoming workshop.

ENERGY SAFETY SHOULD ALLOW SUFFICIENT TIME TO INCORPORATE NEW VEGETATION MANAGEMENT DATA REQUIREMENTS

The proposed revisions require utilities to include (except for palms) the 1) genus of vegetation, 2) species of vegetation, and 3) common name of vegetation for Vegetation Management Project Point, Vegetation Management Inspection Point, Transmission Vegetation Caused Unplanned Outage, Distribution Vegetation Caused Unplanned Outage, Major Woody Stem Exempt Tree Point, and Ignition Point Feature Classes.[4] SCE has recently incorporated these requirements in its vegetation management practices; however, SCE's systems and business processes require time to make these changes. Given that SCE maintains a vegetation management tree inventory of over one million tree records, we have informed Energy Safety that we plan to fully incorporate these requirements by the end of 2022. As such, each quarterly report submission for 2022 will have incremental vegetation management records but a full dataset of these requirements is not expected until the submission of the Q4 2022 quarterly report. SCE recommends Energy Safety explicitly state that new GIS Data Standard requirements and all subsequent versions that have new requirements may not be able to be implemented in a short period of time but that continued improvements in meeting the GIS Data Standard are expected with each quarterly submission.

CONFIDENTIALITY SHOULD BE DETERMINED AT THE FEATURE CLASS LEVEL

The proposed revisions would allow utilities to indicate if an entire feature class or table is considered confidential but still require each specific field in the geodatabase to be marked "Yes" or "No" for confidential treatment.[5] SCE strongly supports basing public dissemination of data at the feature class level as opposed to the individual, specific field because there are millions of records making it difficult to administer and higher risk for improper release of data that should remain confidential. As SCE has previously explained, a feature class should not be made public unless all data fields in in the feature class are non-confidential.[6] SCE has also explained that it has marked individual fields confidential because they contain Critical Energy Infrastructure Information (CEII), confidential customer information, or sensitive risk information and the Status Report template does not allow each field to be partitioned into multiple designations.[7] Given the interrelatedness of the geodatabase and the massive amount of data it contains, maintaining confidentiality at the feature class level will best protect customers and safeguard the public against potential threats to the California electrical grid. SCE supports continued collaboration with Energy Safety, the IOUs, and stakeholders to improve the reporting of geospatial data and ensure critical asset and customer information are protected against potential threats that could harm the California electrical grid and our customers.

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[4] GIS Data Standard at pp. 10-11.
[5] GIS Data Standard at p. 11.
[6] *See*, for example, SCE's Q1 2021 QDR at p. 5.
[7] *See*, for example, SCE's Reply to Public Comments on its May 2021 Quarterly Reports at p. 2.

MAKING QUARTERLY REPORT SUBMISSION DATES DUE 45 DAYS AFTER THE END OF THE QUARTER WILL PRODUCE HIGHER QUALITY DATA

SCE appreciates Energy Safety's desire to "push the upper boundaries of current data collection and reporting efforts."[8] Energy Safety goes on to state that "consistent, high quality, and standardized data are fundamental to Energy Safety's ability to evaluate and monitor the implementation of electrical corporations' wildfire safety and WMPs effectively" and "expects electrical corporations' complete and total cooperation and diligent effort to bring their data submissions into full compliance with Energy Safety's requirements."[9] SCE supports pushing the upper boundaries and agrees that "consistent, high quality, and standardized data" are fundamental to reducing wildfire risk. Energy Safety's requirements and the timing thereof; however, are not aligned with utilities' ability to provide high quality data. As described above, SCE's current system and business processes require time to ensure accuracy. Wildfire mitigation is a substantial effort across tens of thousands of miles of service territory, with numerous programs, multi-year efforts, and thousands of metrics and data points that must be gathered from within and outside of SCE. SCE has invested heavily in business processes and systems to collect, organize, and review this data.. Requiring quarterly reports 30 days from the end of the quarter does not provide enough time to ensure high quality data. An additional 15 days would enable SCE to better align its geodatabase and performance management submissions, resulting in higher quality data – a fundamental requisite for Energy Safety to evaluate and monitor electrical corporations' wildfire safety. Pushing the upper boundaries also requires understanding of current limitations. In order to improve the data quality of quarterly reports, SCE recommends Energy Safety change the quarterly report due dates from 30 days after the end of the month to 45 days. Submission dates could be shortened over time as utilities deploy automated solutions for data consolidation and reporting.

CONCLUSION

SCE appreciates the opportunity to submit its comments on Energy Safety's GIS Data Standard Version 2.2. If you have any questions, or require additional information, please contact me at Gary.Chen@sce.com.

Sincerely,

//s//
Gary Chen
Director
Safety & Infrastructure Policy

[8] GIS Data Standard at p. 1.
[9] GIS Data Standard at p. 1.