



June 22, 2022

Via Electronic Filing

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
Sacramento, CA 95184
caroline.thomasjacobs@energysafety.ca.gov
efiling@energysafety.ca.gov

Subject: Comments of the Public Advocate’s Office on the Draft Decision Approving SCE’s 2022 Wildfire Mitigation Plan Update

Docket: 2022-WMPs

Dear Director Thomas Jacobs,

The Public Advocate’s Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments on the Draft Decision of the Office of Energy Infrastructure Safety (Energy Safety) approving Southern California Edison Company’s (SCE) 2022 Wildfire Mitigation Plan Update. We respectfully urge Energy Safety to adopt the recommendations discussed herein.

I. INTRODUCTION

On February 18, 2022, Southern California Edison Company (SCE) 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 SCE¹ and other large utilities.² On May 13, 2022, Energy Safety issued an extension of the evaluation period,

¹ *Comments of the Public Advocates Office on the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities*, Docket 2022-WMPs, April 11, 2022, pp. 31-42.

² *Comments of the Public Advocates 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.

which deferred publication of a draft decision on SCE's 2022 WMP from May 19, 2022, to June 2, 2022.³

On June 2, 2022, Energy Safety issued its Draft Decision, which contains its *Draft Evaluation of 2022 Wildfire Mitigation Plan Update: Southern California Edison 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 22, 2022.

In these comments, Cal Advocates addresses the following:

- Energy Safety should direct SCE to identify and mitigate all C-Hooks present on SCE transmission assets, including those outside of the High Fire Threat District (HFTD).
- Cal Advocates strongly supports Energy Safety's requirement that SCE identify overdue repairs that present a potential ignition risk and provide a plan to address the overdue repairs.

II. Grid Design and System Hardening

A. Energy Safety should direct SCE to provide a plan in its 2023 WMP to identify and mitigate all remaining C-hooks on SCE transmission assets.

Aged C-hooks have an unacceptably high risk of failure.⁵ In fact, a C-hook failure contributed to the catastrophic Camp Fire in 2018.⁶

Energy Safety's Draft Decision on SCE's 2022 WMP Update does not address the C-hooks on SCE transmission assets outside of the HFTD. However, a potential C-hook failure could cause a wildfire or other safety incident, regardless of its location within, adjacent to, or outside of the HFTD.

In 2021, Energy Safety ordered SCE to "develop a plan for determining the condition of each of its existing C-hooks, or demonstrate that it has an existing plan that addresses

³ Energy Safety, *Extension of the evaluation timeframe for Southern California Edison's 2022 Wildfire Mitigation Plan Update*, Docket 2022-WMPs, May 13, 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.

⁵ *Comments of the Public Advocates Office on the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities*, Docket 2022-WMPs, April 11, 2022, pp. 35-36.

⁶ "A Summary of the Camp Fire Investigation." Butte County District Attorney, p. 2. Available at: <https://www.buttecounty.net/Portals/30/CFReport/PGE-THE-CAMP-FIRE-PUBLIC-REPORT.pdf>, retrieved on April 4, 2022.

C-hook replacements,” and to “provide the details of this plan, including the timeframe for execution.”⁷ This order does not specify that it is limited to the HFTD.

SCE does not have an inventory of C-hooks outside of the HFTD and has not taken any efforts to inventory them.⁸ SCE acquired transmission assets that include C-hooks as a part of SCE’s 1964 acquisition of Calelectric Power Company, but does not know if it inventoried these assets at the time of acquisition.⁹

SCE acknowledges Cal Advocates’ concern with C-hooks and commits to exploring methods of identifying and replacing them,¹⁰ which is a positive development. Nevertheless, formal reporting through the WMP process remains the appropriate path for SCE to address the matter. Energy Safety should direct SCE to identify and mitigate all C-hooks present on SCE transmission assets (including those outside of the HFTD) and to report its progress in its 2023 WMP.

III. Asset Management and Inspections

A. Cal Advocates supports Energy Safety’s requirement that SCE provide a plan to identify overdue repairs that present a potential ignition risk.

Energy Safety’s order requiring SCE to resolve its maintenance backlog is reasonable and prudent. SCE has a substantial number of unresolved and overdue maintenance issues. In our comments on SCE’s WMP Update, Cal Advocates recommended that Energy Safety require SCE to resolve this backlog and prevent a similar backlog from recurring.¹¹ The Draft Decision appropriately orders SCE to identify overdue repairs that present a potential ignition risk and provide a plan to address them, including prioritization and quantitative targets, so that Energy Safety can track the completion and timing of repairs.¹²

⁷ Energy Safety’s *Final Action Statement on the 2021 Wildfire Mitigation Plan (WMP) Update of Southern California Edison Company*, August 18, 2021, p. 67.

⁸ SCE’s response to DR CalAdvocates-SCE-2022WMP-10, question 4, March 24, 2022.

⁹ SCE’s response to DR CalAdvocates-SCE-2022WMP-10, question 6, March 24, 2022.

¹⁰ SCE states: “SCE understands the concern that an aging C-hook could potentially cause adverse safety outcomes should it become defective. In light of this concern, SCE will explore cost-effective methods to identify and replace C-hooks outside the HFTD.” Southern California Edison Company, *Reply Comments to Public Comments on Southern California Edison Company’s 2022 Wildfire Mitigation Plan Update*, April 18, 2022, p. 13.

¹¹ *Comments of the Public Advocates Office on the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities*, Docket 2022-WMPs, April 11, 2022, p. 35.

¹² Specifically, Energy Safety’s Draft Decision requires SCE to:

identify overdue repairs that present a potential ignition risk, and provide a plan to address the overdue repairs, including prioritization and quantitative targets for overdue repairs relating to wildfire risk, so that Energy Safety can track the completion and timing

In its Draft Decision, Energy Safety orders SCE to “demonstrate that it is completing targeted mitigations... based on risk analysis” with the aim of decreasing “ignitions in high-risk areas.”¹³ As Energy Safety’s Draft Decision notes, SCE experienced an increase in equipment-related ignitions on in 2021.¹⁴ Resolving overdue repairs and implementing targeted mitigations should help to reduce equipment-related ignitions in future years.

IV. 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,

/s/ **Carolyn Chen**

Carolyn Chen
Attorney

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Telephone: (415) 703-1980
E-mail: Carolyn.Chen@cpuc.ca.gov

June 22, 2022

Energy Safety’s *Draft Decision on Southern California Edison Company’s WMP 2022 Update*, June 2, 2022, p. 61.

¹³ Energy Safety’s *Draft Decision on Southern California Edison Company’s WMP 2022 Update*, June 2, 2022, p. 62.

¹⁴ Energy Safety’s *Draft Decision on Southern California Edison Company’s WMP 2022 Update*, June 2, 2022, p. 62.