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VIA OEIS E-FILING
DOCKET # 2023-2025-WMPs

Office of Energy Infrastructure Safety
California Natural Resources Agency
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Re: California Association of Small and Multi-Jurisdictional Utilities (“CASMU”) Comments on the Draft 2023 WMP Schedule

Bear Valley Electric Service, Inc. (“BVES”), Liberty Utilities (CalPeco Electric) LLC (“Liberty”), and PacifiCorp, d.b.a. Pacific Power (“PacifiCorp”) (collectively, the California Association of Small and Multi-Jurisdictional Utilities (“CASMU”)) provide the following comments on the Draft 2023 Wildfire Mitigation Plan (“WMP”) Schedule (“Draft Schedule”).

I. New WMP Requirements Will be Burdensome and Difficult for the CASMU Members to Address Within the Proposed Schedule.

As highlighted in prior comments to the Office of Energy Infrastructure Safety (“Energy Safety”), as well as in comments submitted concurrently today on the Draft 2023-2025 Wildfire Mitigation Plan Guidelines (“Guidelines”), although the CASMU members are electric utilities, they differ significantly from California’s largest investor-owned utilities, Pacific Gas and Electric Company, Southern California Edison Company (“SCE”), and San Diego Gas & Electric Company (collectively, the “Large IOUs”). The CASMU utilities are significantly smaller than the Large IOUs with more limited resources. For example, utility planning, wildfire

mitigation efforts, and program implementation and administration is conducted and handled by significantly smaller staff for the CASMU members than at the Large IOUs.¹ Additionally, each CASMU member has less than 50,000 customers, and disproportionate administrative costs are a more significant burden for a smaller number of customers.

The California Wildfire Safety Advisory Board (“Board”) has and continues to recognize the limited resources of the CASMU members and the disproportionate burdens and costs that the CASMU members face and incur compared to the Large IOUs. As noted in the Board’s April 26, 2022 Recommendations to Office of Energy Infrastructure Safety on Additional Wildfire Mitigation Plan Requirements and Performance Metrics (“Recommendations”), Energy Safety should “develop a revised set of Guidelines for the small and multi-jurisdictional utilities (SMJUs) ... to help them best allocate limited resources and relieve these smaller entities from detailed reporting requirements that are more applicable for the large IOUs.”²

CASMU’s comments on the Guidelines describe why the Guidelines should be simplified and streamlined for the SMJUs in light of their more limited resources. So too should the Draft Schedule be revised to provide additional time for the SMJUs to submit their WMPs. Providing additional time will ensure that the CASMU members can adequately address the substantial number of new WMP requirements by the WMP deadline.

¹ BVES currently has approximately 45 employees and approximately 24,500 customers, and Liberty has approximately 100 employees and approximately 49,000 customers. Compared to SCE’s 12,715 employees for its 5.201 million customers,¹ BVES and Liberty, respectively, have approximately 0.4% and 0.8% of the workforce to implement any WMP requirements and 0.5% and 0.9% of the customer base from which to recover administrative costs associated with the WMP. PacifiCorp, with approximately 48,000 California customers, has approximately 0.9% of SCE’s customer base from which to recover administrative costs. These numbers are based on SCE’s 2021 Financial & Statistical Report, available at <https://www.edison.com/content/dam/eix/documents/investors/sec-filings-financials/2021-financial-statistical-report.pdf>.

² Recommendations, pp. 5-6.

II. The Schedule Should Provide Additional Time for the SMJUs to Submit WMPs.

New WMP requirements are a significant departure from prior requirements and will impose substantial burdens on the CASMU members. Major changes from prior WMP requirements will inherently require significant work to modify, update, and reorganize prior and current WMP efforts. For example, to comply with the revised Guidelines, information that was previously submitted in prior WMPs will need to be moved and repackaged at an estimated cost of over 2,000 labor hours. There are many additional requirements that are new and/or will require substantial amounts of work to address. To provide sufficient time to address these new WMP requirements, CASMU requests an additional month to submit WMPs. CASMU's proposed revised schedule, with comparisons of dates included in the Draft Schedule, is as follows:

Draft Schedule Date	CASMU Recommended Date	Item
December 16, 2022	No change	Energy Safety Distributes Maturity Survey to Electrical Corporations
January 30, 2023	No change	Maturity Survey Due
February 1, 2023	No change	Q4 2022 Quarterly Data Reports Due (pursuant to WMP Data Guidelines)
February 13, 2023	No change	Large IOUs WMP Pre-Submissions Due
March 6, 2023	No change	Energy Safety Issues Completeness Check Results to Large IOUs
March 6, 2023	April 3, 2023	SMJUs/ITOs Pre-Submission Due
March 27, 2023	April 24, 2023	Energy Safety Issues Completeness Check Results to SMJUs/ITOs
March 27, 2023	No change	Large IOUs submit WMPs
April 6, 2023	No change	Substantive errata due for Large IOUs
April 17, 2023	May 15, 2023	SMJUs/ITOs submit WMPs
Mid-April 2023	No change	WMP Workshop for Large IOUs (2 Days)
April 26, 2023	No change	Non-substantive errata due for Large IOUs
April 27, 2023	May 25, 2023	Substantive errata due for SMJUs/ITOs
Early May 2023	Early June 2023	WMP Workshop for SMJUs/ITOs
May 26, 2023	No change	Opening Comments Due for Large IOU WMPs
June 5, 2023	No change	Reply Comments Due for Large IOU WMPs
June 6, 2023	July 6, 2023	Opening Comments Due for SMJU/ITO WMPs
June 16, 2023	July 17, 2023	Reply Comments Due for SMJU/ITO WMPs

End of June 2023	No change	Revision Notices Issued for Large IOUs (where necessary)
Mid July 2023	No change	Draft Decisions Issued for Large IOUs without Revision Notices
End of July 2023	End of August 2023	Revision Notices Issued for SMJUs/ITOs (where necessary)
Early August 2023	Early September 2023	Draft Decisions Issued for SMJUs/ITOs without Revision Notices

III. Conclusion

CASMU appreciates this opportunity to provide comments on the Draft Schedule. To address the more limited resources of the CASMU members and provide sufficient time for the SMJUs to complete new WMP requirements, the Draft Schedule should provide an additional month for the SMJUs to submit their WMPs.

Respectfully Submitted,

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