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Caroline Thomas Jacobs, Director
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California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Docket# 2023-2025-WMPs

SUBJECT: Southern California Edison's Comments on the Draft 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey

Dear Director Thomas Jacobs,

Pursuant to the Office of Energy Infrastructure Safety's (Energy Safety) Draft 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey (Maturity Survey), Southern California Edison (SCE) respectfully submits the comments provided below.

INTRODUCTION

SCE believes the Maturity Model is an important tool that can be used to benchmark California utilities against each other and other utilities across the country—a significant benefit. SCE appreciates the great effort undertaken to develop the proposed Maturity Model, which represents a wholesale change in the structure, questions, and scoring rubrics from the previous version, and greatly expands the scope of the survey, to include over 1,000 questions. In Sections 1.1 and 1.2, below, SCE proposes short-term adjustments to the Maturity Model, which SCE believes will make the responses more meaningful and the scores more suitable for comparison across the utilities. In Section 1.3 below, SCE recommends a process to further calibrate maturity levels.

MATURITY MODEL

1.1 Adjusting the Scoring Methodology to Use the Average of Scores Within a Capability Instead of the Lowest Score Will Make Scoring More Informative, Meaningful, and Comparable Across Utilities

The proposed Maturity Model includes scoring for 37 individual capabilities, with each capability containing subordinate scoring philosophies and scoring schemes. As proposed, the score for each capability is determined by the lowest score from its subordinate scoring philosophies.

This minimum scoring approach makes the results less informative and meaningful by obscuring areas where a utility is performing at a higher level. For example, if a utility performs well in many scoring philosophies for a given category, but scores a 1 in one of the scoring philosopies, the score would be a 1 for that entire capability. In addition to discarding the information contained in the scores for the scoring philosophies that were higher than the 1, and thus by definition making the result less informative, this makes

the scores less comparable across utilities. For example, if two utilities have the same score for a capability, one cannot compare this score or conclude the utilities have the same maturity without looking at the individual scoring philosophy scores. In this sense, the minimum scoring approach contradicts the intention of comparable maturity scores, as it does not accurately reflect the full balance of each utiliy's strengths and weaknesses, and incorrectly suggest that similar scores at the category and capability level will represent similar maturity. In fact, similar scores will simply indicate commonality in the lowest level of maturity without regard to which area scored the lowest or whether the utility has other areas of higher maturity.

While a minimum scoring rubric or "weakest link" scoring approach may be appropriate in industries or cases in which performance is truly set by the lowest-performing element, such an approach is neither accurate nor appropriate in the context of utility wildfire mitigation, in which performance reflects a large mix of roles, functions, and capabilities. It is not akin to a linear process in which a defect or weakness in one part of a sequence directly translates into a defective result. Rather, utility wildfire mitigaiton is an extensive and complex effort drawing on diverse areas from weather forecasting to construction project management, and as such, defining maturity based on a lowest score inaccurately suggests that overall performance is limited by the area with the lowest score.

SCE recommends that capabilities should be scored based on the average of their constituent scoring philosophies, as opposed to the minimum. An average scoring approach reflects the balance of strengths and weaknesses within the capability and more accurately represents a utility's actual maturity and anticipated performance.

For example, SCE performed a preliminary scoring exercise for the Grid Operations & Protocols category. Under the minimum scoring method as defined in the Draft Guidelines, the Maturity Model estimated SCE's score for this category as a 0.75. In contrast, by calculating the capability scores by averaging the scoring philosophy scores, the Maturity Model estimated a category score of 2.9. SCE does not see the 0.75 value as accurate or representative of its abilities in Grid Operations & Protocols, as it suggests that overall maturity (and by implication performance) in Grid Operations & Protocols cannot exceed the lowest score from a potentially small number of questions within the scoring philosophies that brought down the capability score and ultimately the category score.

An average approach at the capability level would be consistent with the approach used for the category and overall WMP maturity level scoring: "The maturity level of a single category is determined from the average of all the capability maturity levels within that category. The maturity levels across all category scores are then further averaged to develop a single maturity level for the entire WMP."

If Energy Safety has determined that the minimum scoring approach is necessary, SCE recommends that capability scores should be calculated as both an average of the constituent scoring philosophies and as equal to the lowest scoring philosophy within the capability. This would allow Energy Safety and other observers to better understand the sensitivity of scores to the scoring approach.

1.2 Clarification of Maturity Model Survey Questions Is Needed to Make Prescribed Actions Achievable and Responses Comparable Across Utilities

SCE intends to collaborate with Energy Safety, other utilities, and stakeholders to refine the questions in the Maturity Model and remove any ambiguities. Although not an exhaustive analysis, below, SCE highlights a few themes to illustrate potential improvements to the Maturity Model's current design.

- Several draft survey questions use the word "all," and the table below provides a few examples for reference. In many of these questions, it will be nearly impossible for a utility to answer "yes" if "all" is interpreted literally to cover every conceivable case due to the sheer number and scope of decisions made, employees managed, and community partners engaged by the utility in the course of day-to-day operations. In order to make such questions more meaningful, SCE recommends that SCE work with Energy Safety and stakeholders to clarify the scope of these questions. For example, instead of using the absolute wording of "all," the Maturity Model could consider alternative language that uses thresholds to determine the scope of the question (e.g., dollars, units, asset types), wording such as "most," or that clarifies the specific situation(s) in which the question applies (e.g., field workers vs all employees).

Category, Capability, Number	**Question**
Category C; Capability 16; SP Subject Matter Expert Verification 3.3.6.Q6	Are **all** design decisions assessed in collaboration with other electrical corporations and government? Re-phrase: Are **design** decisions applicable to [asset X] made in collaboration with other electrical corporations? **0-25%(1) 26-50% (2)….. Etc.**
Category C; Capability 16; SP Subject Matter Expert Verification 3.3.6.Q8	Are **all** design decisions assessed in collaboration with the research community? Re-phrase: Are design **decisions for emerging technologies over $X** assessed in collaboration with the research community? Yes/No
Category C; Capability 17; SP Frequency 3.4.2.Q2	Does the electrical corporation provide standard training materials to **all** employees? Re-phrase: Does the electrical corporation provide standard **safety** training materials to **field employees who could encounter wildfires**? Yes/No

Category G; Capability 33; SP Comprehensiveness 7.1.1.Q13	Does the electrical corporation coordinate, collaborate and support **all** community partners on their respective community outreach and educational awareness programs annually? Re-phrase: Does the electrical corporation coordinate, collaborate **and/or** support **wildfire** community partners on their respective community outreach and educational awareness programs annually? Yes/No

- Several questions use the term "each," and the table below provides a few examples for reference. In these examples, the phrase "each equipment" causes the same issue discussed above with respect to use of the term "all," i.e., the scope is potentially so broad that few, if any, utilities in the country would likely be able to answer in the affirmative. This would be the case if "each equipment" includes any piece of equipment attached to a pole, or existing in a substation, including nuts, bolts, coverings, guy wires, etc. However, if "each equipment" is only intended to cover equipment exceeding a certain dollar threshold, size, etc., these questions would be possible to answer meaningfully.

Category, Capability, Number	**Question**
Category C; Capability 13; SP Level of Sophistication 3.1.2.Q7	Does the database contain repair history for **each** equipment within the service area?
Category C; Capability 13; SP Level of Sophistication 3.1.2.Q6	Does the database contain the manufacturer for **each** equipment within the service area?

- Several draft survey questions use the term "key," and the table below provides a few examples for reference. This term is subject to interpretation, and without clarification/calibration it is unlikely the utilities will define it the same way, or the way Energy Safety intends. This makes comparisons across utilities very difficult and ultimately not meaningful. Because SCE understands that one objective of the Maturity Model is to be able to understand a utility's progress over time, and to understand how that maturity compares to that of other utilities, SCE sees opportunities for further calibration of Maturity Model questions and definitions.

Category, Capability, Number	**Question**
Category G; Capability 33; SP Comprehensiveness 7.1.1.Q2	Does the electrical corporation identify and evaluate all **key** community stakeholder groups across the electrical corporation's service territory before, during, and after an incident?
Category G; Capability 33; SP Comprehensiveness 7.1.1.Q4	Does the electrical corporation identify **key** community partnerships to collaborate and coordinate on wildfire and PSPS public education and awareness efforts before, during, and after an incident?

SCE notes that the questions referenced above are just a few examples of the over 1,000 questions included in this Maturity Model. It is clear that Energy Safety has put forth a significant effort to revamp the Maturity Model for the 2023-2025 WMP cycle. SCE appreciates the intentions of doing so and seeks to partner with Energy Safety and other stakeholder to further clarify the questions, define and standardize terms, and remove subjectivity so that this Maturity Model can accurately reflect each utility's true maturity and capabilities, and allow for results to be comparable across utilities.

1.3 The Real-World Value of Maturity Model Scoring Levels Requires Further Discussion to Consider Factors such as Customer Affordability or Cost/Benefit of Reacher Higher Maturity Levels

Recognizing the great effort that has been undertaken to develop the updated Maturity Model, the limited time between when the Maturity Model Survey will be issued and when it is due, and SCE's limited recommendations above, SCE has concerns with certain stated "higher" levels of maturity that should be addressed through collaboration. For example, the Maturity Model does not take into account customer affordability or the value associated with the maturity levels within each scoring philosophy. SCE submits that it is not meaningful to consider maturity without regard to feasibility, cost, value, and broader opportunity costs. But rather than make wholesale changes at this time, SCE instead recommends Energy Safety adopt SCE's recommendations above and initiate a Maturity Model Working Group to allow for further discussion about acceptable and meaningful changes in a measured and collaborative way.

There are several instances where a higher level of maturity can be gained by performing work with greater frequency, but the survey does not evaluate the feasibility or cost effectiveness of doing so, or how doing so might negatively affect other important objectives. For example, SCE does not agree that utilities should attempt to remediate all Priority 2 findings in HFRA within two weeks—not only is this impractical, it would also be very costly and negatively affect the utility's ability to achieve other important safety, reliability, and customer-driven objectives. Further, to presume this would be considered a "best practice" disregards the inefficiencies and operational complexities that would be introduced. Given that SCE is not aware of any utility that follows this practice, SCE is not clear on the basis for this maturity level, and suspects that it may not be the result of benchmarking. Similarly, in another capability area, SCE questions the value and appropriateness of setting an objective to recalculate RSEs on a monthly basis, which is considered a "beyond best practice" maturity level. RSEs are a planning tool that help to inform utility decision-making on wildfire mitigation selection, but for many of our mitigations, particularly those that have long planning and construction timelines, there is little value in recalculating RSEs that frequently, and does not see the value in the costs and resources that would be required to reach that level.

SCE understands Energy Safety's objective to incentivize utilities to continue maturing their wildfire mitigation efforts; however, SCE respectfully requests broadening the maturity evaluation to appropriately consider the cost-effectiveness, feasibility, value proposition, and opportunity costs of each scoring philosophy's maturity scoring rubric. Absent this broader perspective, the Maturity Model – as currently designed – may lead to outcomes that are incongruent with a utility's obligation to provide safe, reliable, and

affordable power to customers. Because several maturity levels require tradeoffs with operational efficiency, customer affordability, and resource allocation, SCE believes there would be value in establishing a working group amongst Energy Safety, utilities, and stakeholders to review and refine these maturity levels.

To support this effort, SCE will document instances where it sees concerns with the "higher" levels of maturity as it completes the Maturity Model Survey. SCE requests that the format of the Maturity Model Survey be modified to include comment fields for each question so that utilities can address concerns at the question level. SCE believes these notes will help begin discussions with Energy Safety, utilities, and stakeholders in a structured process to improve the Maturity Model. As a result, SCE encourages Energy Safety to consider utilities' first response to the updated Maturity Model as preliminary and subject to modification as maturity levels are further calibrated.

CONCLUSION

SCE appreciates the opportunity to submit these comments on the Maturity Survey. If you have questions, or require additional information, please contact me at michael.backstrom@sce.com.

Sincerely,

//s//
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Southern California Edison