

10/26/22

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**Docket# 2023-2025-WMPs**

**SUBJECT:** Southern California Edison's Comments on the Draft 2023-2025  
Wildfire Mitigation Plan Guidelines – Package 1

Dear Director Thomas Jacobs,

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

### **INTRODUCTION & SUMMARY**

SCE appreciates Energy Safety issuing the Draft Guidelines and related documents in September allowing utilities to begin organizing and developing their 2023-2025 WMP. SCE further appreciates this opportunity to provide comments on Energy Safety's proposals and the ability to participate in the October 17, 2022 2023-2025 WMP Guidelines Workshop (Workshop).

SCE has reviewed the draft proposals and agrees with Energy Safety's intent to improve the WMP framework, flow and related processes by, 1) restructuring the chapters into a problem-solving framework, 2) consolidating technical areas into dedicated sections, and 3) streamlining the comprehensive WMP and post-base-year WMP Update submissions and evaluation processes.

SCE supports these objectives, and provides comments below intended to clarify or confirm issues discussed during the workshop, as well as to suggest modifications to elements of the Draft Guidelines where changes would be beneficial.

### **TECHNICAL GUIDELINES**

#### **1.1 SCE Appreciates and Strongly Agrees with Energy Safety's Clarifications at the Workshop that Significant Changes to Risk Models are Not Required by the 2023-2025 WMP Submission, and that Utilities Can Implement Changes Over the Course of the 2023-2025 WMP Period**

SCE welcomed the statements made by Energy Safety at the Workshop indicating that utilities are not expected to make major changes to their risk modeling practices by the time of the 2023-2025 WMP submission in February 2023. SCE also appreciated the

statements from Energy Safety that—to the extent that the Draft Guidelines require a change in approach—the utilities have flexibility to implement those changes over the course of the 2023-2025 WMP period and may suggest (subject to Energy Safety review) alternatives to what is directed in the final guidelines.<sup>1</sup>

SCE strongly agrees with these points given the high level of specificity in risk modeling and forecasting techniques, data sources, and methodologies prescribed in Sections 5, 6, 7, and Appendix B of the Draft Guidelines. In several cases, the Draft Guidelines require significant shifts that will take considerable time and effort to implement. For example, shifting to a probabilistic model from SCE’s current approach of a maximum consequence-based model is a fundamental change that would require significant time and effort to implement. Further, a probabilistic approach would not be specific to utility-caused ignitions, which would bring in factors outside of a utility’s control. SCE therefore respectfully requests confirmation of the flexibility noted by Energy Safety at the Workshop, and below offers proposed modifications to the Draft Guidelines and highlights areas where further discussion would be beneficial.

Considering this guidance, SCE suggests the following statement be added at the outset of Sections 5.3, 5.4, 6.2, and 6.3:<sup>2</sup>

“Unless explicitly stated otherwise, a utility is not required to have the practices in place by the time of submission of the 2023-2025 WMP. A utility may also propose different approaches or data sources than what is described within this section, indicating why the different approach or data source is preferable and why it will offer an equal or better evaluation of wildfire risk and risk reduction.”

In the subsections below, SCE suggests specific modifications that would allow utilities to describe the factors used in their methodologies, modeling, calculations, etc. and provide an explanation if any of the data sources, methods, or factors listed are not used. In addition, SCE’s recommendations would allow utilities the opportunity to identify any alternative information used for risk quantification.

SCE believes once the recommended changes detailed herein are incorporated into the final guidelines, SCE can 1) respond to all prompts, 2) identify which prompts we either cannot provide, and/or do not agree with and why, 3) provide alternative models, methods, and/or datasets, where available, and 4) benchmark our submission with PG&E and SDG&E and use the submissions as a basis for further discussion in the Risk Modeling Working Group.

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<sup>1</sup> SCE recommends that any potential modeling changes be previewed and discussed in advance through the Energy Safety-sponsored Risk Modeling Working Group workshops, along with a meeting summary and a written comment period to align on data sources and methods, prior to adopting those changes for future WMP filings. Parties need to consider the impacts of potential changes to utility wildfire risk modeling roadmaps, as well as downstream impacts to utility decision making, mitigation selection, and prioritization, which may take several years to implement.

<sup>2</sup> Throughout these Comments, SCE uses red text to highlight recommended changes to the Draft Guidelines.

### 1.1.1 Energy Safety Should Ensure the Final Guidelines Allow Utilities Greater Flexibility in Describing its Risk Methodologies

There are several instances where Energy Safety uses the terms “minimum requirements” in referring to new models, methods, and datasets for risk assessment/calculations, weather forecasting, etc. SCE recommends several changes below, intended to provide utilities with reasonable flexibility to explain current risk methodologies and approaches.

#### Section: 6.2.1 (p. 48)

- **Suggested Redline Change:** “~~At a minimum, the~~ The electrical corporation must ~~evaluate~~ describe the impact of the following factors on the quantification of risk. ~~If an electric corporation does not use a particular factor, it must explain why and identify any alternative factors.~~”

#### Section: 6.2.1 (p. 48)

- **Suggested Redline Change:** “While the overall risk framework and associated risk components identified in Section 6.2 are ~~the minimum recommended~~ requirements for determining overall risk, the electrical corporation may elect to include ~~additional~~ other risk components, as needed, to better define risk for its service territory. Where the electrical corporation identifies ~~additional~~ other terms as part of its risk framework, it must define those terms. The electrical corporation must include a schematic demonstrating its adopted risk framework (similar to Figure 6-2), including any components beyond ~~minimum recommended~~ requirements.”

#### Section: 6.2.1 (pp. 50-52)

- **Suggested Redline Change:** “~~There are a minimum of~~ These five intermediate risk categories should be considered by the electrical corporation ....~~There are a minimum of~~ These nine fundamental risk components should be considered by the electrical corporation ....The electrical corporation ~~must adopt~~ should consider adopting these definitions in this section of the WMP.”

#### Section: 6.2.2 (p. 52)

- **Suggested Redline Change:** “The electrical corporation ~~must calculate~~ should consider each risk and risk component defined in Section 6.2.1. Appendix B provides additional ~~requirements~~ recommendations on these calculations. These are the ~~minimum recommended~~ requirements and are intended to establish the baseline evaluation and reporting of all electrical corporations. If the electrical corporation identifies other key factors as important, it must report them in the WMP in a similar format.”

#### Section: 6.2.2 (p. 53)

- **Suggested Redline Change:** “Additional input parameters beyond the ~~minimum recommended~~ requirements for a specific risk component. Calculations of additional outputs beyond the ~~minimum recommended~~ requirements for a specific risk component.”

#### Appendix B, Section 1.1.10 (p. 4)

- **Suggested Redline Change:** “Within each of these subsections, additional ~~minimum recommended~~ requirements are established for each of these calculations.”

#### **Appendix B, Section 1.1.12.1 (p. 14)**

- **Suggested Redline Change:** “~~At a minimum, the~~The electrical corporation ~~must should~~ evaluate the 30-year weather history within its service territory to determine realistic design scenarios. The calculation of the weather history used by the electrical corporation ~~must should~~ meet the following requirements: Model outputs ~~must should~~ include ~~at least~~ the following”

#### **Appendix B, Section 1.1.12.2 (p. 15)**

- **Suggested Redline Change:** “The electrical corporation ~~must should~~ track, calculate, and report the following”

#### **Appendix B, Section 1.1.12.4 (p. 16)**

- **Suggested Redline Change:** “These are the ~~minimum-recommended~~ requirements and are intended to establish baseline evaluation and reporting for all electrical corporations.”

#### **Appendix B, Section 1.1.12.5 (p. 20)**

- **Suggested Redline Change:** “These are the ~~minimum-recommended~~ requirements and are intended to establish baseline evaluation and reporting for all electrical corporations.”

#### **Appendix B, Section 1.1.12.6 (p. 22)**

- **Suggested Redline Change:** “The calculation ~~must should~~ include a combination of at least the following” (same edit to the same sentence that appears three times in this section)

#### **Appendix B, Section 1.1.12.7 (p. 22)**

- **Suggested Redline Change:** “These are the ~~minimum-recommended~~ requirements and are intended to establish baseline evaluation and reporting for all electrical corporations.”

### **1.1.2 New Risk Model Scenarios Would Take Significant Time to Develop and Should Be Considered in the Risk Modeling Working Group**

In Section 6.3, utilities are directed to develop several design basis and extreme-event scenarios. These scenarios prescribe different wind loading, weather, and vegetation conditions, many of which are not needed to assess risk for long term planning purposes because for wildfire mitigation, a utility would construct to mitigate the riskiest scenario, rendering the other scenarios moot. As such, developing these scenarios are unnecessary. Further, these requirements would necessitate developing new models that could take several years to complete. As such, any consideration of using scenarios should first be discussed and agreed-upon in the Risk Modeling Working Group led by Energy Safety before utilities are required to incorporate into their wildfire risk modeling. SCE’s proposed modifications above would allow utilities to either provide a plan to meet these requirements over time, or to describe how their current practices sufficiently meet the intent of the requirements in Section 6.3.

### 1.1.3 Utilities Should Be Able to Use Different Datasets Than Those Prescribed in the Draft Guidelines

The Draft Guidelines require the application of data that may be in its nascent stages or not yet available at a meaningful level of granularity. Some examples include data relating to social vulnerability, population egress and climate change. In these instances, SCE recommends the flexibility to use other data sources which are granular and/or more applicable to SCE's service territory. SCE recommends changes below, intended to provide utilities with reasonable flexibility to provide alternative datasets.

- **Section: 5.4 (pp. 35-36)**
  - **Requirement:** In the Community Values at Risk section of the Draft Guidelines (Section 5.4), there is a requirement for a utility to “identify the community values at risk across its service territory” and “at a minimum” to “provide a high-level overview of the distribution of customer types (urban, rural, and highly rural), customers in a wildland-urban interface (WUI), communities at risk per CAL FIRE, access and functional needs (AFN) customers, socially vulnerable communities, communities vulnerable because of single access/egress routes, and high-value assets at risk within the service territory.”
  - **Recommendation:** Several of the data sources listed are not currently used in SCE's risk models. SCE notes that these data sources are either not spatially granular enough for the intended use case (e.g., CAL FIRE Communities at Risk) or incomplete (e.g., AB211 egress map) to identify locations of population vulnerability of egress. SCE proposes that to fulfill these requirements, utilities be allowed to, where applicable, provide the sources that are used in their risk models to identify the community values at risk. This would also help to integrate the connected and related elements of Sections 5, 6, and 7 more fully together.
  - **Suggested Redline Changes:**
    - **Section 5.4.3.2 – Communities at Risk per CAL FIRE (p. 37):** “The electrical corporation must provide a brief narrative (one to two paragraphs) describing the communities at risk per CAL FIRE data **or a comparable data source, such as that used in its risk models**, across its service territory. In addition, the electrical corporation must provide a single geospatial map or **GIS layer** showing its service territory (polygon) overlaid with the communities at risk (point data) **or polygons used in applicable risk models.**”
    - **Section 5.4.3.5 – Sub-Divisions with Limited Egress or No Secondary Egress (p. 39):** “The electrical corporation must provide a brief narrative (one to two paragraphs) describing the sub-divisions with limited egress or no secondary egress, per CAL FIRE data **or a comparable data source, such as that used in its risk models**, across the electrical corporation's service territory.

#### Section 5.4.3.4 (p. 38)

- **Requirement:** “[P]rovide a brief narrative describing the intersection of social vulnerability and community exposure to electrical corporation wildfire risk across its service territory. This intersection is defined as census tracts that 1) exceed

the 70th percentile in Social Vulnerability Index (SVI) or have a median household income of less than 80 percent of the state median, and 2) exceed the 85th percentile in wildfire consequence risk according to the electrical corporation's risk assessment(s).

For SVI, the electrical corporation must use the most up-to-date version of Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry's Social Vulnerability Index dataset..."

- **Recommendation:** SCE currently uses an AFN multiplier that has greater spatial granularity than the SVI datasets and is directly tied to the vulnerability of SCE customers served by specific circuits. Because of this, it would be beneficial to allow SCE to use its AFN multiplier data to inform this requirement.
- **Suggested Redline Change:** "Provide a brief narrative describing the intersection of social vulnerability and community exposure to electrical corporation wildfire risk across its service territory **using SVI, or another meaningful source, such as an AFN multiplier.**"

SCE notes that risk modeling is not a "one size fits all" endeavor and that different approaches, including alternative datasets, can be appropriate and legitimate. SCE supports Energy Safety's desire to establish a baseline of consistency, quality, and rigor in risk modeling and forecasting,<sup>3</sup> but cautions that moving too far in the direction of prescriptive requirements can result in unnecessary re-work and churn by requiring utilities to change risk modeling practices without a meaningful improvement in quantifying wildfire risk. SCE was greatly encouraged by the tone and content of the Workshop, and Energy Safety's stated intention to allow for reasonable flexibility in utility risk modeling approaches, datasets, etc. SCE appreciates the consideration of its comments and again reiterates the value of the Risk Modeling Working Group as a venue to discuss these topics.

## 1.2 SCE Proposes Modifications to the Draft Guidelines to Improve the WMP and Improve Clarity

SCE would like to seek clarification / modification on the following items found in the Draft Guidelines. For ease of review, SCE offers suggested redline changes for Energy Safety's consideration in the development of the final guidelines.

### Section: 6.2.2.2 (pp. 53-54)

- **Requirement:** Utilities "must calculate the consequences of a fire originating from its equipment and the consequence of implementing a PSPS event to prevent a catastrophic wildfire in the community."
- **Recommendation:** To SCE's knowledge, the term "catastrophic" has not been defined and as such recommends using the term "significant"<sup>4</sup> instead.

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<sup>3</sup> Final Action Statement on SCE 2021 WMP Update, p.10, SCE-21-03 that explains how utilities do not have a consistent approach to wildfire risk modeling and establishing a risk modeling working group, led by Energy Safety, to develop a more consistent statewide approach to wildfire risk modeling.

<sup>4</sup> As discussed in SCE's 2022 Risk Assessment Mitigation Phase (RAMP) report, "significant" fires are simulated fires that, at 8 hours after ignition, burned more than 10,000 acres or had at least one fatality or had at least 50 structures impacted.

- **Suggested Redline Change:** Utilities “must calculate the consequences of a fire originating from its equipment and the consequence of implementing a PSPS event to prevent a **significant** wildfire in the community.”

#### Section: 7.1.4.1 (pp. 76)

- **Requirement:** “The electrical corporation must...describe its process and procedures to evaluate options for mitigating wildfire and PSPS risk at various analytical scales. The current decision governing this process is the 2018 Safety Model Assessment Proceeding (2018 S-MAP), adopted in D.18-12-014 (see S-MAP, step 3, rows 15–25). However, the CPUC is considering modifications to the approach in D.18-12-014 through R.20-07-013. The electrical corporation’s process to evaluate risk mitigation options must align with any changes resulting from R.20-07-013.”
- **Recommendation:** A proposed decision in the Risk OIR is expected within the next few months, but it will be too late to incorporate any changes which may or may not result from a final decision into the 2023-2025 WMP. The final guidelines should clarify that any changes resulting from the Risk OIR final decision must be incorporated into the utility’s next WMP Update, and not its imminent Base WMP. SCE appreciates that at the Workshop, Energy Safety clarified that the intent of this requirement is to align risk analyses across agencies over time, and not immediately for utilities’ 2023-2025 WMP submissions.
- **Suggested Redline Change:** “...However, the CPUC is considering modifications to the approach in D.18-12-014 thorough R.20-07-013.19. **Any changes resulting from the Risk OIR final decision must be incorporated into a utility’s future WMP Update.**”

#### Section: 7.2.2.2 (pp. 83)

- **Requirement:** “...provide a figure showing the overall risk in its service territory as a function of time. The figure is expected to cover at least 10 years.”
- **Recommendation:** The 10-year requirement should be removed and adjusted to either (1) the WMP 3-year period (2023-2025); or (2) the period for which the utility has developed meaningful mitigation plans (e.g., 2023-2028 – SCE’s GRC period). SCE does not have detailed scoping plans beyond the last year of its forthcoming GRC cycle, which runs through 2028, and estimating risk reduction absent such plans would not be a fruitful or meaningful exercise. SCE appreciates Energy Safety’s guidance on this matter at the Workshop.
- **Suggested Redline Change:** “...provide a figure showing the overall risk in its service territory as a function of time. The figure is expected to cover **either (1) the WMP 3-year period (2023-2025); or (2) the period over which the utility has developed detailed mitigation plans.**”

#### Section 7.2.3 (pp. 83-84)

- **Requirement:** The Summary of Mitigation Initiatives and Activities Section has the following requirements:
  - “...Provide a detailed implementation strategy for each mitigation initiative selected in accordance with the risk-informed process discussed in Section 7.1”
  - “...For each mitigation initiative, the electrical corporation must provide the following:

- High-level overview of the mitigation initiative
- Implementation Plan, including schedule and monitoring of progress
- .....

However, the table that follows where utilities must insert this information (Table 7-3) is noted to be at the WMP Category level.

- **Recommendation:** SCE raised this question at the Workshop and appreciates Energy Safety’s guidance that his language should be modified to reflect the information required is at the WMP Category level. This will create consistency with Table 7-3.
- **Suggested Redline Changes:**
  - ““...Provide a detailed implementation strategy for each **WMP Category** selected in accordance with the risk-informed process discussed in Section 7.1”
  - “...For each **WMP Category**, the electrical corporation must provide the following:
    - High-level overview of the **WMP Category**
    - Implementation Plan, including schedule and monitoring of progress
    - .....

**Sections: 8.3.1.2, 8.4, 8.5, and 9.1.4 (pp. 129, 151, 197, 217)**

- **Requirement:** “...provide the following:
  - Utility Initiative Tracking IDs
  - Projected targets for the three years of the Base WMP and relevant units
  - Quarterly, rolling projections for end of 2023 and 2024 (inspections only)
  - For 2023–2025, the “x% risk impact.” The x% risk impact is the percentage risk reduction identified in Table 7-2 for a specific mitigation initiative (see Section 7.2.2.1 for calculation instructions)
  - Method of verifying target completion”
- **Clarification Requested:** The phrase, “Quarterly, rolling projections for end of 2023 and 2024 (inspections only)” is repeated for each mitigation category. During the Workshop, Energy Safety clarified that this requirement is only required for Inspections, and two other areas. SCE requests the final guidelines be updated to reflect this clarification.

**Section 8.3.4.1 (pp. 139-140)**

- **Requirement:** “...provide the following additional information for each system in an accompanying narrative:
  - General location of detection sensors (e.g., HFTD or entire service territory)
  - Resiliency of sensor communication pathways
  - Integration of sensor data into machine learning or AI software
  - Role of sensor data in risk response
  - False positives filtering
  - Time between detection and confirmation
  - Security measures for network-based sensors”
- **Recommendation:** SCE can provide information for most of these requirements, but requests the final guidelines remove the two requirements to provide



information on “Time between detection and confirmation” and “False positives filtering.” SCE’s high definition (HD) camera data feeds are available to the public and to fire agencies. Fire agencies generally rely on the cameras to observe fire behavior, evaluate fire growth potential, and help determine where to deploy resources, among other things. SCE utilizes these cameras to make real-time observations of environmental conditions to help coordinate with fire agencies to protect utility infrastructure. While emerging technology may eventually allow for the ability to provide advanced detection and notification of ignitions, that is currently not an established function of SCE’s cameras.<sup>5</sup>

- **Suggested Redline Change:** “...provide the following additional information for each system in an accompanying narrative:
  - General location of detection sensors (e.g., HFTD or entire service territory)
  - Resiliency of sensor communication pathways
  - Integration of sensor data into machine learning or AI software
  - Role of sensor data in risk response
  - ~~False positives filtering~~
  - ~~Time between detection and confirmation~~
  - Security measures for network-based sensors”

#### Appendix A (pp. 16)

- **Definition:** the “*Reportable Ignition*” definition. The guidelines define it as: “Any event where utility facilities are associated with the following conditions:
  - (a) A self-propagating fire of material other than electrical and/or communication facilities, and
  - (b) The resulting fire traveled greater than one linear meter from the ignition pointThis includes all ignitions determined by an Authority Having Jurisdiction (AHJ) investigation to originate from utility infrastructure or employees.”
- **Recommendation:** SCE proposes modifying the definition to match the CPUC’s reportable ignition criteria. SCE notes that changing the definition of reportable ignitions will create substantial inconsistencies with numerous wildfire reports across state agencies and likely require substantive changes to existing data reporting currently provided to Energy Safety.
- **Suggested Redline Change:** Reportable Ignition:
  - a) Ignition is associated with the utility’s powerlines (both transmission and distribution);
  - b) something other than the utility’s facilities burned; and
  - c) the resulting fire traveled more than one meter from the ignition point

#### Appendix B (pp. 18)

- **Requirement:** “The calculation for the equipment likelihood of ignition from each type of equipment must include the following minimum information: ... “Automatic PSPS systems (i.e., protective equipment and device settings).”

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<sup>5</sup> See [SCE’s Comments on CPUC Draft Resolution SPD-3](#) for similar comments provided in response to proposed 2023-2025 WMP metrics.

- **Recommendation:** This language conflates PSPS with protective equipment and device settings, but these are two distinct concepts and applications. PSPS involves proactively shutting off power when certain weather conditions are present. Protective equipment and device settings help to reduce the likelihood of an ignition when a fault or fault condition is present.
- **Suggested Redline Change:** “The calculation for the equipment likelihood of ignition from each type of equipment must include the following minimum information: ... “**Protective equipment and device settings**”.

## **Geospatial Layers Requested in the Draft Guidelines and Provided in the Quarterly Data Reports**

Below are examples of requested geospatial data layers that are also submitted as part of the QDR submission:

### **Section 5.3.3 (pp. 29-30)**

- **Requirement:** “...provide a map of its service territory overlaid with the HFTD and HFRA. The map must be accompanied by tabulated statistics on the CPUC-defined HFTD and electrical corporation-defined HFRA across the electrical corporation’s territory...” SCE provides this information in the GIS Spatial QDR through the Administrative Area Feature Class Layer.

### **Section 5.4.4.2 (pp. 40)**

- **Requirement:** “...provide geospatial map(s) showing its service territory (polygon) overlaid with critical facilities (point data) and critical infrastructure (points and/or lines, as appropriate) to the extent this information is publicly available.” SCE provides this information in the GIS Spatial QDR through the Critical Facilities Feature Class Layer

**Recommendation:** As discussed in the Workshop, SCE requests that the final guidelines clarify that if a required geospatial layer is already provided in QDR, the utility can reference the location of that layer in the QDR instead of duplicating the geospatial data layer in the WMP submission.

## **1.3 Independent Review of Risk Models**

In Section 6.6.1, the Guidelines require utilities to, “report on its processes and procedures for independent review of data collected (e.g., through sensors or inspections) and generated (e.g., through risk models and software) to support decision making by qualified experts.” All of SCE’s risk models do not undergo independent review by third parties, and it would not be feasible or practical to do so by the WMP submission date. As such, SCE recommends that the following language be added to the final guidelines of this section: “**The electrical corporation must describe its processes to review the accuracy of data collected and generated by its risk models. The electrical corporation must also describe its use of independent third-party reviews as part of these processes, where applicable, as well as any plans for improving processes and procedures going forward.**”

#### **1.4 Risk Model Documentation and Substantiation**

Appendix B<sup>6</sup> requires extensive information and documentation pertaining to the risk modeling approach used by utilities. This includes additional detail on model calculations supporting the calculation of risk and risk components, additional detail on the calculation of risk and risk components, and more detailed presentation of the risk findings. SCE supports increasing the transparency and review of our risk models as a way to continuously improve and enhance our risk modeling framework. However, due to the extensive and comprehensive nature of these Draft Guidelines, SCE requests that additional time be afforded to utilities to address all of these requirements over time.

To effectuate this, SCE recommends the following language be added to the statement on page 4 of Appendix B: “Within each of these subsections, additional minimum requirements are established for each of these calculations. **The electrical corporation must address the minimum requirements for models they are currently employing and to the extent the documentation, processes, or calculations exist in time for the 2023-2025 WMP submission. Otherwise, the electrical corporation must either provide a roadmap detailing its plan to satisfy each requirement over the course of the WMP cycle or explain how existing approaches or alternatives can be used to achieve the desired outcome of the requirement.**”

#### **1.5 Large Tables**

At the workshop, Energy Safety indicated that its goal is to distribute the Guideline templates in November 2022 and noted that the templates will be Word-based including the tables. SCE notes that some tables could be hundreds of rows. For example, Tables 6-5 and 7-2 require a risk-ranking list by circuit or circuit-segment. Energy Safety currently states, for Table 6-5, that “if this table is longer than two pages, the electrical corporation must append the table.” For all tables, SCE recommends Energy Safety add language that explains how tables that exceed two pages should be populated and submitted in Excel files and how in the Word template, utilities may include a sample of that data.

#### **1.6 Risk Spend Efficiencies**

At the workshop, Energy Safety indicated it specifically removed mention of Risk Spend Efficiencies (RSEs) from the Draft Guidelines. SCE notes that they were removed from Table 12, as well. However, in SCE’s Final Decision on its 2022 WMP Update, there were several areas for continued improvement (ACIs) related directly to RSEs. Specifically, SCE-22-22 (Third Party Confirmation of RSE Estimates), SCE-22-23 (RSE Estimates of Emerging Initiatives), and SCE-22-24 (RSE Estimates used for Capital Allocation). For consistency, SCE recommends Energy Safety clarify that SCE does not have to incorporate these ACIs in its next filing and that they will be modified accordingly when the Commission issues its final decision in the Risk OIR.

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<sup>6</sup> See Appendix B, pp. 4-29.

## **PROCESS AND EVALUATION GUIDELINES**

### **1.7 SCE Supports Efforts to Optimize and Differentiate Base WMP and Subsequent WMP Updates, And Recommends an Update Process for the 2024 Period**

SCE supports Energy Safety's efforts to streamline the WMP and its evaluation process. Energy Safety includes a new year-ahead process that would require utilities to submit its 2025 WMP Update in 2024. SCE supports a year-ahead process for the 2025 WMP Update<sup>7</sup> but believes an update is needed for the 2024 period. Locking in 2023 and 2024 targets as part of the 2023-2025 WMP evaluation process (and annual reports on compliance) could unwittingly drive the wrong outcome. SCE will provide preliminary forecasts beyond 2023 for its mitigations; however, operational factors and constraints, improvements in risk modeling, prioritization, mitigation effectiveness, etc., lessons learned and studies may render those forecasts speculative or obsolete. For example, illustratively, SCE could set targets for covered conductor of 1,000 miles in 2023 and 1,000 miles in 2024. Under this scenario and all else remaining equal, if SCE completes 1,300 miles in 2023, it would need to complete 700 miles to reach 2,000 miles over this two-year period but would still have a 2024 target of 1,000 miles if we are not able to update 2024 targets. Similarly, SCE anticipates continually improving its ability to target, plan and prioritize mitigations in the highest risk areas which could lead to higher/lower targets for its mitigations in 2024. Also, studies being conducted in 2023 could lead to new mitigations in 2024. Keeping 2024 compliance targets based on forecasts developed in 2022 and early 2023 would not provide utilities flexibility in making improvements to their wildfire mitigation efforts.

Accordingly, SCE recommends Energy Safety include an Update process for the 2024 period. At a minimum, SCE recommends a mechanism for utilities to be able to update their 2024 wildfire mitigation initiatives' scope, targets, and costs (including potentially new mitigations), where applicable, and explain any changes. A simple update could include the ability to update 2024 scope, targets, and costs in the Q4 2023 Quarterly Reports (anticipated to be due on Feb. 1, 2024) and for those targets to be the annual compliance goals for 2024. Another option could be to modify the Change Order Guidelines requirements to allow for changes to 2024 scope, targets and costs including potentially new mitigations. A more structured update, similar to the principles outlined for the 2025 WMP Update, may require further discussion and workshops. SCE supports working with Energy Safety, utilities and stakeholders in establishing a 2024 WMP Update process that seeks efficiency and appropriate robustness. Absent such a 2024 Update process, the mitigations and targets provided for 2024 in the 2023-2025 WMP should not be associated with any 2024 compliance requirements.

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<sup>7</sup> SCE also supports the five areas targeted for the 2025 WMP Update as described in Section 13 that includes: 1) progress on Areas of Continued Improvement from previous decision(s), 2) updates resulting from approved Change Order Requests, 3) mid-year and end-of-year targets for the year covered in the WMP Update, 4) updates based on lessons learned during the previous years, and 5) updates based on significant changes to risk models.

## 1.8 The Completeness Check Process Should be Described More Clearly, and Should Be an Administrative Pre-Submission Process

SCE supports the pre-filing completeness check submission process and suggests a few changes to streamline the process and reduce the potential for inefficient stakeholder review.

Given that the pre-submission process is not intended to trigger the three-month statutory deadline to approve or deny a plan,<sup>8</sup> SCE recommends Energy Safety change it to a pre-filing administrative process between utilities and staff. This would result in several benefits: (1) it would not trigger the three-month statutory timeline requirement, (2) it would allow utilities additional time to make their WMP filing ADA compliant; i.e., the completeness review would not include checking for ADA compliance, (3) it would allow utilities to send one WMP for this submission (marked confidential) as opposed to a public and confidential version, and, (4) it would not make the WMP pre-submission, which may not be complete, subject to discovery. There is also precedent for such a pre-filing administrative process between utilities and staff. For example, the California Public Utilities Commission (CPUC) has used such a pre-filing administrative process as part of general rate cases<sup>9</sup> and infrastructure licensing projects.<sup>10</sup> Regarding the latter, the CPUC has documented the benefits of a pre-filing administrative process to ensure completeness prior to formal review.<sup>11</sup>

While SCE intends to submit an entirely complete and final WMP on February 13, 2023, as a practical matter the WMP should not be available to the public or stakeholders until Energy Safety has determined it to be complete and ready for evaluation. This is consistent with the intent of the completeness check process, which is described as “The objective of the completeness check is to ensure that electrical corporations’ WMP submissions are complete prior to commencing evaluation.” If parties are able to review the WMPs submitted on February 13, and to submit discovery requests, it will short-circuit this process by allowing evaluation to begin from stakeholders before Energy Safety has even determined that the WMP is complete and ready for evaluation.

To effectuate this change, SCE recommends the row on Attachment 1 of the draft WMP schedule should be renamed from “Large IOU WMP Pre-Submissions Due” to “**Large IOUs Submit WMPs for Administrative Completeness Check**”. A corresponding edit should be made to the row for March 27, renaming “Large IOUs submit WMPs” to “**Large IOUs submit WMPs with Administrative Completeness Issues Remedied (if needed)**.” Likewise, the corresponding language for these steps for Small-Medium Joint Utilities / Independent Transmission Operators should be modified. Additionally, SCE recommends Energy Safety make clear that the administrative completeness check submission is a process between the utilities and Energy Safety only, does not start the clock for the statutory evaluation process, nor can data requests be submitted during

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<sup>8</sup> See Draft 2023 WMP Schedule, p. 2 that reads “*Following this completeness check, the electrical corporations will submit WMPs for the statutory evaluation process.*” (emphasis added)

<sup>9</sup> The original electric utility rate case plan review process included an applicant serving a Notice of Intent (NOI) to staff to ensure the applicant substantially complied with the requirements. Once staff notified an applicant that the NOI had been accepted, an applicant would then file its formal application.

<sup>10</sup> See, for example, the CPUC’s [Guidelines for Energy Project Applications Requiring CEQA Compliance](#), pp. 1-3.

<sup>11</sup> *Id.* at p. ii.

this time. Clarifications for filing one WMP, not needing to be ADA compliant (because it will not be posted) could also be explained in the final guidelines.

### **1.9 SCE Requests that Final Guidelines Include Redline Versions to Allow for Clear Indication of Changes from the Draft Guidelines**

Based on verbal comments in the workshop, SCE understands that Energy Safety is planning to issue final guidelines and templates in November or December 2022. A redline version that compares changes from the draft to final guidelines would greatly improve the ability of utilities and stakeholders to quickly and efficiently understand what has changed, which in turn reduces the administrative burden to begin preparations for the 2023 WMP in earnest.

### **CONCLUSION**

SCE appreciates the opportunity to submit these comments on the Draft 2023-2025 WMP Guidelines and related documents. If you have questions, or require additional information, please contact me at [michael.backstrom@sce.com](mailto:michael.backstrom@sce.com).

Sincerely,

//s//

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