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VIA OEIS E-FILING
DOCKET # DATA GUIDELINES

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 Draft Data Guidelines

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 Data Guidelines (“Guidelines”).

I. New Wildfire Mitigation Data Schema Requirements Should Apply Beginning with the Q1 2023 Reporting Period.

The Guidelines specify that the new “data standards described in [Section 4 of] this document are effective as of [the Q4 2022 reporting period].”¹ This means that utilities must submit Wildfire Mitigation Data schema in accordance with the new Wildfire Mitigation Data Tables Template and the requirements outlined in Section 4.3 of the Guidelines starting with the Q4 2022 Quarterly Data Report (“QDR”) submission which is due February 1, 2023. CASMU is concerned that this is insufficient time for utilities to fully implement and comply with new

¹ Guidelines, p. 1.

requirements. The Guidelines include 13 new tables that are substantially different from data submitted for Q1 – Q3 2022 QDRs. To address the new requirements and provide the required data, utilities will need to modify Q1 – Q3 2022 QDR data submitted in accordance with the prior Energy Safety QDR template to fit and adhere to the new template. This process is challenging in the best of circumstances, but particularly for the upcoming Q4 2022 deadline. To begin with, the Guidelines are still in draft form and may be modified before adoption. Furthermore, the upcoming holidays will additionally reduce time available to comply with new requirements before the February 1 deadline. Completing new templates based on new requirements is a resource-intensive process and inadequate time to complete this work is likely to lead to errors. These issues are further compounded given the comparatively smaller sizes of the CASMU members and their more limited resources.²

To address and avoid these issues, CASMU recommends that the new requirements not become effective until the Q1 2023 reporting period. New reporting requirements that require significant revisions to prior in-year reporting should not take effect within a given reporting year. Instead, such requirements should take effect in the subsequent reporting year. This

² Each CASMU member has less than 50,000 customers, and disproportionate administrative costs are a more significant burden for a smaller number of customers. Utility planning, reporting, and program implementation and administration is conducted and handled by significantly smaller staff for the CASMU members than at the Large IOUs (Pacific Gas and Electric Company, Southern California Edison Company (“SCE”), and San Diego Gas & Electric Company). For example, BVES currently has approximately 45 employees and approximately 24,500 customers, and Liberty has approximately 100 employees and approximately 49,000 customers. PacifiCorp leverages approximately 75 California based and centralized resources to comply with Energy Safety requirements and programs for the company’s 48,000 customers in California. Compared to SCE’s 12,715 employees for its 5.201 million customers,² BVES, Liberty, and PacifiCorp, respectively, have approximately 0.4%, 0.8%, and 0.6% of the workforce to implement any Energy Safety requirements and 0.5%, 0.9%, and 0.9% of the customer base from which to recover costs associated with QDR reporting and adherence to Energy Safety requirements. (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>.)

approach will ensure consistent reporting within a given year. It is also important that new requirements, particularly requirements like those included in Section 4.3 of the Guidelines that will require significant changes from prior reporting requirements, should only apply prospectively to future years. Given the time and cost associated with complying with new requirements, such new requirements should apply for the 2023 reporting year beginning with the Q1 2023 reporting period. This approach provides the additional benefit of syncing timing for complying with new requirements. For example, new requirements for Geographic Information System (“GIS”) data, as required by the new GIS Data Reporting Standard Guidelines, is not required until the Q1 2023 reporting period. Similarly, new metrics required by CPUC Resolution SPD-3 are also not required until the Q1 2023 reporting period. For these reasons, the Guidelines should be revised so that new Wildfire Mitigation Data Tables Template requirements, QDR tables 1-13, and the requirements outlined in Section 4.3 of the Guidelines will not apply to the 2022 reporting period but instead will apply beginning with the Q1 2023 reporting period.

II. New Templates Should Utilize Consistent Metrics and Provide Additional Clarity – Table 2 Should Include a “Lightning” Risk Event Category and Clarify How Utilities Should Report Lightning Events.

The Draft QDR Wildfire Mitigation Data Tables 1-13 template should be modified to provide consistency with both the Guidelines as well as the GIS Data Reporting Standard Guidelines with respect to risk event metrics. While Table 2 of the Wildfire Mitigation Data Tables Template: Tables 1-12 includes three separate “Risk Events” metric types, none of the “Risk Events” include or address lightning. However, the Guidelines specifically reference

“Lightning” as a risk event.³ The GIS Data Reporting Standard Guidelines similarly include “Lightning” as a cause of ignition or unplanned outage.⁴ To provide consistency with the Guidelines, Table 2 of the Wildfire Mitigation Data Tables Template: Tables 1-12 should be modified to include “Lightning” as a “Risk Event.”

Energy Safety has also instructed utilities to reduce the number of risk events that fall within the “Other” category. Based on this instruction, the Guidelines and/or templates should provide additional clarity as to how utilities should report lightning-related risk events, as well as other risk event categories not captured in the template.

III. Conclusion

CASMU appreciates this opportunity to provide comments and looks forward to working with Energy Safety and interested stakeholders to further refine the Guidelines.

For the reasons outlined above, new Guideline requirements should not apply until the Q1 2023 reporting period. Additionally, Table 2 of the Wildfire Mitigation Data Tables Template: Tables 1-12 should be modified to include “Lightning” as a “Risk Event.”

Respectfully Submitted,

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³ See Guidelines Section 3.7.4.2, p. 66; Section 3.7.4.3, p. 70; and Section 3.7.4.4, p. 76.

⁴ See GIS Data Reporting Standard Guidelines, Section 3.3.6.4 PPS Event Support Structure Damage Detail (Related Table), p. 59; Section 3.4.3 Ignition (Feature Class), p. 71; Section 3.4.4 Transmission Unplanned Outage (Feature Class), p. 76; Section 3.4.6 Distribution Unplanned Outage (Feature Class), p. 80.