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**Via Electronic Filing**

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**Subject: Public Advocates Office Comments on Draft Data Guidelines**

**Docket: Data Guidelines**

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits the following comments on the Draft Data Guidelines of the Office of Energy Infrastructure Safety (Energy Safety). We urge Energy Safety to adopt the recommendations discussed herein.

Sincerely,

/s/ ***Carolyn Chen***

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## I. INTRODUCTION

On October 28, 2022, Energy Safety published the Draft Data Guidelines applicable to electrical corporations' submission of data related to their Wildfire Mitigation Plans (WMPs).<sup>1</sup> Cal Advocates submits the following comments, which primarily focus on avoiding potential technical errors and clarifying the instructions and definitions in the draft data guidelines.

## II. COMMENTS

### A. **Energy Safety should establish a California-specific projection standard for geospatial data (Section 3.2 Overall Data File Requirements).**

Currently, Energy Safety requires utilities to submit geospatial data in the World Geodetic System 1984 (WGS 1984) coordinate reference system<sup>2</sup> and requires measurements from geospatial data to use the NAD 1983 California (Teale) Albers projected coordinate system.<sup>3</sup> The use of two systems is potentially confusing and introduces unnecessary data conversion steps, which in turn introduces the possibility for spatial error and data corruption. Therefore, to simplify submission, Energy Safety should specify a single projection system to such as a custom Universal Transverse Mercator,<sup>4,5</sup> Teale Albers (as used by California Department of Fish and Wildlife<sup>6</sup>), or the forthcoming Oblique Mercator,<sup>7</sup> which are better suited to California.

### B. **Data files and data structures, not just accompanying documentation, should be labeled with confidentiality status (Section 3.6.3 Feature Dataset Sheets).**

Energy Safety has removed the “Confidential” attribute in several feature classes.<sup>8</sup> Cal Advocates agrees that labeling individual features as confidential in each feature class is unnecessary and that file names and feature dataset sheets should be used to denote confidentiality (as outlined in Sections 2.3. and 3.6.3. respectively). However, to minimize the potential risk of inadvertent disclosure of confidential information, attributes, tables, and feature classes submitted by the utilities should have the confidentiality status identified in the actual data structures, i.e., in the geodatabase, not just the supporting documentation. By relying on the datasheets, as currently required, Energy Safety risks

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<sup>1</sup> Draft Data Guidelines, <https://efiling.energysafety.ca.gov/Search.aspx?docket=Data%20Guidelines>, accessed 10/28/2022 (Draft Data Guidelines).

<sup>2</sup> Draft Data Guidelines, p. 10, accessed 28 October 2022.

<sup>3</sup> Draft Data Guidelines, fn 5 p. 11, accessed 28 October 2022

<sup>4</sup> A California Universal Transverse Mercator zone would be centered at -120° rather than -123° (UTM 10) or -117° (UTM 11). See Section 4 for list of CRS including “UTM 10.5”. [https://cgia.org/wp-content/uploads/2020/05/Boggs-Chavira\\_Spatial-Data-Standards-Reference-Guide.pdf](https://cgia.org/wp-content/uploads/2020/05/Boggs-Chavira_Spatial-Data-Standards-Reference-Guide.pdf), accessed 17 November 2022.

<sup>5</sup> <https://community.esri.com/t5/coordinate-reference-systems-questions/which-projected-coordinate-system/td-p/794407> accessed 17 November 2022.

<sup>6</sup> CDFW Projection and Datum Guidelines <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109326> accessed 17 November 2022

<sup>7</sup> See diagram with skewed azimuth meant to serve all state plane zones, at <https://www.xyht.com/surveying/state-plane-coordinates-2022/>, accessed 17 November 2022.

<sup>8</sup> Draft Data Guidelines, p. 16.

inappropriate disclosure of confidential data due to lack of labeling in the data files and geodatabase structures themselves.

**C. Section 3.7.2. Asset Line (Feature Dataset).**

**1. The granularity of the dataset is unclear and should be more explicitly defined (Section 3.7.2).**

Energy Safety states that “each line must represent a single circuit.”<sup>2</sup> As written this can be interpreted as meaning that each feature should represent a circuit, i.e., one polyline per circuit. Since Energy Safety asks for a segment ID, it can be inferred that Energy Safety requires each feature to represent a circuit *segment*, i.e., many polylines per circuit. If this is the case, then the introductory paragraph needs to provide Energy Safety’s definition of a circuit segment. Cal Advocates understands a circuit segment to be a sub-division of a circuit between segmentation devices. However, a circuit segment could be interpreted as being a span between two support structures or some other sub-division of a circuit. Energy Safety should clarify these requirements.

**2. Provenance of risk scores for each feature class submission should be provided as part of documentation and metadata (Section 3.7.2).**

For the Asset Line (Feature Dataset), there is a potential technical error related to the following feature classes: *Transmission Line (FC)*; *Transmission Line Detail*; *Primary Distribution Line (FC)*; *3.7.2.4 Secondary Distribution Line (FC)*; and attributes: *OverallUtilityRisk*; *Ignition Risk*; *PSPSRisk*.<sup>10</sup> Energy Safety should provide a way for utilities to share the provenance of risk calculation for a given line segment, i.e., model name, date, and version. This information should be provided as part of the attribute table or the information in the Feature Dataset Sheets.

**D. Photographic submissions should remain mandatory (Sections 3.7.4.1. Wire Down Events; 3.7.5.1. Vegetation Inspections; 3.7.5.1. Vegetation Management Projects; 3.7.5.3. Asset Inspections; 3.7.5.4. Grid Hardening).**

For wires down events, vegetation inspections, vegetation management, asset inspections, and grid hardening, Energy Safety has made the inclusion of photographic submissions optional.<sup>11</sup> However, photos are highly relevant to safety. Submission of photographs should remain mandatory, and Energy Safety should work with utilities and stakeholders to decide on the best way to submit photos in these categories such that the process is relevant for all and is not inconvenient or burdensome.

**E. Section 4.3.1 Table 1: Quarterly Initiative Update Data (QIU).**

**1. Energy Safety should clarify that financial units should not be used to show progress towards quarterly or EOY targets (Section 4.3.1 Table 1).**

The Data Guidelines state that utilities should use only numeric values for their quantitative targets in the QIU.<sup>12</sup> In 2022, at least one utility submitted dollar amounts as quantitative targets.<sup>13</sup> This does

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<sup>2</sup> Draft Data Guidelines, p. 37.

<sup>10</sup> Draft Data Guidelines, p. 37.

<sup>11</sup> Draft Data Guidelines, pp. 82-133.

<sup>12</sup> Draft Data Guidelines, p. 153.

<sup>13</sup> See, e.g., PacifiCorp’s Quarterly Initiative Update for the third quarter of 2022.

not report a utility's progress, which is more accurately measured in physical units, e.g., number of miles hardened. Reporting only financial units limits the ability of Energy Safety and stakeholders to effectively monitor and evaluate progress towards targets. Energy Safety should revise section 4.3.1 of the Data Guidelines to state that utilities may not use financial units to report either targets or progress in QIUs.

**2. Energy Safety should add financial data to the QIU (Section 4.3.1 Table 1).**

Utilities should still report financial data on a quarterly basis. This would allow Energy Safety and stakeholders to assess whether a utility's work is proportionate to its spending on the initiative, and whether it is likely to overrun or underrun its cost forecasts for the year. Energy Safety should add the following two columns to Table 1:

- Cost forecast for each quarter in the current year.
- Actual spending for each quarter in the current year.

**F. Energy Safety should standardize the definition of “high” fire potential index (FPI) (Section 4.3.4 Table 4 Weather Patterns).**

Table 4 of the non-spatial data tables requires utilities to report the number of overhead circuit mile days subject to “high” Fire Potential Index (FPI).<sup>14</sup> The Data Guidelines do not provide guidance on how utilities should determine what constitutes a “high” FPI. In the absence of a standard definition, the utilities will use their own definition.<sup>15</sup> This may make comparison between utilities impossible, as each utility could employ both different methods and different threshold regarding what is considered a “high” FPI.

Energy Safety should standardize the threshold for “high” FPI. For example, Energy Safety could state that a “high” FPI is greater than 90% of the historical range of FPI values across the preceding three-year WMP period. A standard threshold would enable all parties to assess the instances of “high” FPI across different utility service territories and assess trends in how FPIs are changing with the climate compared to a fixed previous period.

**G. Section 4.3.13 Table 13: Open Work Orders / Notifications.**

**1. Energy Safety should limit Table 13 to overdue work orders (Section 4.3.13 Table 13).**

Table 13 requires utilities to report all work orders/notifications for corrective actions on electric distribution circuits.”<sup>16</sup> From January 1, 2019 through the first quarter of 2022, Pacific Gas and Electric (PG&E) opened over half a million tags, or approximately 170,000 tags each year.<sup>17</sup> A table of all open tags could therefore result in a very large dataset, primarily consisting of tags that may not be due for several years.<sup>18</sup>

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<sup>14</sup> Draft Data Tables Template, Table 4, row 19.

<sup>15</sup> Appendix B of the draft WMP Technical Guidelines require utilities to present their approaches to calculating FPI, which may result in dramatically different FPI calculations between utilities. WMP Guidelines, Appendix B, p. 27.

<sup>16</sup> Draft Data Tables Template, Table 13.

<sup>17</sup> PG&E's response to Critical Issue RN-PG&E-22-05, July 11, 2022 p. 41.

<sup>18</sup> The majority of PG&E's tags are level 3 issues. Per GO 95 Rule 18, level 3 issues must be addressed within 60 months.

Additionally, it is unclear what “corrective actions” refers to. Many utilities have a corrective action program that tracks issues such as process improvements or addressing systemic issues. These corrective actions may not be confined to an equipment type or high fire threat district (HFTD) tier, nor will they have clear due dates per General Orders. These should not be included in Table 13.

Energy Safety should revise Table 13 to only require work orders or notifications, and limit the reporting to tags that are either overdue or due within the reported quarter.<sup>19</sup> To track utility progress, Energy Safety should add two columns to Table 13:

- Was the work order completed within the reported quarter (Y/N)?
- Date the work order was completed, if applicable.

These changes would allow Energy Safety and stakeholders to quickly assess the size and severity of a utility’s maintenance backlog, as well as the utility’s progress toward remediating any such backlog.

## **2. Energy Safety should separate Table 13 into multiple tables according to WMP category (Section 4.3.13 Table 13).**

Utilities track work orders for different programs, such as vegetation management, asset inspection, distribution corrective work orders, transmission corrective work orders, etc. A utility may have a substantial backlog in one category but be keeping up with work in another. For ease of analysis, Energy Safety should separate Table 13 into multiple tables that each cover one WMP initiative category such as asset inspection, vegetation management, etc.

### **H. Other general issues with non-spatial data tables**

In this section, Cal Advocates identifies more minor concerns. Energy Safety should consider making the proposed changes to the non-spatial data tables to both ease the reporting burden on utilities and enhance the ability of stakeholders to efficiently analyze the large amounts of data requested.

- Tables 8-9 – Energy Safety should consider removing these tables. Information on where utilities plan to add or remove equipment is more appropriate for GIS data than a tabular format.
- Table 10 – PSPS projections are generally not useful measures of performance, as they depend heavily on weather conditions that are generally outside a utility’s control. Energy Safety should remove these projections from this table.
- Table 11 – Energy Safety should add columns for risk spend efficiency (RSE) estimates, disaggregated by HFTD tier, for each initiative. While RSEs are an imperfect measure, they are useful for assessing whether utilities are appropriately allocating resources to eliminate the maximum risk while minimizing the incremental cost to ratepayers.
- Table 12 – Energy Safety should merge this table into Table 1. Table 1 contains a column to track whether an initiative has a hard midyear target. Filtering by this column will result in a table very similar to Table 12. The tables should be merged to reduce duplication of effort.

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<sup>19</sup> Due dates should be defined per GO 95 timelines, without allowing the utility to redefine the asset correct time through re-inspections or other means.

**I. Energy Safety should continue to include Safety Performance Metrics 8 and 9 as part of the final 2023 Data Guidelines.**

Cal Advocates does not support the removal of the Safety Performance Metrics 8 and 9 which requires the utilities to report on fatalities resulting from utility wildfire mitigation initiatives and on OSHA-reportable injuries due to utility wildfire mitigation initiatives respectively.<sup>20, 21</sup> The information that is reported as part of Metrics 8 and 9 play an important role in helping stakeholders determine and reach conclusions about the workplace safety culture of a utility. Cal Advocates understands that the data reported is covered by other state or federal authorities; however it would be inefficient for interested stakeholders to go elsewhere to obtain this type of detailed information, when the utilities have been reporting this information in one location and on a consistent basis since the utilities' 2021 WMP Update submissions.<sup>22</sup> Energy Safety should continue to include Safety Performance Metrics 8 and 9 as part of the final 2023 Data Guidelines and require the utilities to continue reporting this data.

**III. 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](mailto:Henry.Burton@cpuc.ca.gov)) or Holly Wehrman ([Holly.Wehrman@cpuc.ca.gov](mailto:Holly.Wehrman@cpuc.ca.gov)).

Respectfully submitted,

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<sup>20</sup> Attachment 2.2: 2021 Wildfire Mitigation Plan (WMP) Guidelines Template, November 2020, pp. 34-35.

<sup>21</sup> Per Energy Safety's workshop on 2023 Draft Data Guidelines, slide titled "Removed Metrics for 2023".

<sup>22</sup> Based on Cal Advocates' analysis of previous Wildfire Mitigation Plan submissions from PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp.