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715 P Street 20th Floor  
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**E-filed Docket: Data Guidelines**

**SUBJECT:** Southern California Edison Company's Comments on Draft Data Guidelines

Dear Mr. Lai,

Southern California Edison Company (SCE) appreciates the revisions made by the Office of Energy Infrastructure Safety (Energy Safety) to its Geographic Information Systems Data Standard Guidelines (GIS Data) and Wildfire Mitigation Data (Non-Spatial Data Tables) and the opportunity to provide comments. SCE provides the following comments regarding the draft Data Guidelines.

**CHANGES TO THE GIS DATA STANDARD AND THE NON-SPATIAL DATA TABLES SHOULD BOTH BE MADE EFFECTIVE WITH THE Q1 2023 QUARTERLY SUBMISSION**

Energy Safety proposes the updated GIS Data be effective with the Q1 2023 quarterly submission but that the updated Non-Spatial Data Tables be effective with the Q4 2022 quarterly submission.<sup>1</sup> Energy Safety also states that the data submitted by the utilities in the wildfire mitigation data tables must be internally consistent with the GIS data submitted.<sup>2</sup> The proposed GIS and non-spatial changes include new data structures, nomenclature, and unique identifiers to ensure consistency across all data submitted. As such, implementing the new Non-Spatial Data Tables while using the previous GIS Data Schema for the Q4 2022 quarterly submission would result in misalignment. Further, requiring the new Non-Spatial Data Tables to be used for the Q4 2022 QDR would introduce many inconsistencies in the reporting of quarterly data with the Q1, Q2, and Q3 2022 QDRs.

For example, there are several data elements and tables within the new Non-Spatial Data Tables that require forward looking forecasts on WMP activity initiative scope and costs, projections of risk events based on mitigation effectiveness, and the introduction of new performance metrics applicable to the 2023-2025 WMPs. Since electrical corporations are required to submit their WMPs on February 13, 2023, the use of the new Non-Spatial Data Tables for the Q4 2022 reporting period would precede the WMP

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<sup>1</sup> Data Guidelines at p. 1.

<sup>2</sup> Data Guidelines at p. 149.

submission by approximately two weeks. It is very likely that final data on cost, scope, risk modeling, and other projections may not be finalized in time to provide for the Q4 submission, as electrical corporations are working expeditiously to meet the February 13<sup>th</sup> submission.

There are several instances in Energy Safety's Draft 2023-2025 WMP Technical Guidelines that require information in the forthcoming WMP narrative to align with the QDR data.<sup>3</sup> Because SCE's WMP submission covers 2023 – 2025, this alignment requirement should apply to the forward-looking reporting data that will be tracked beginning Q1 2023. As such, a full realignment of the data used to produce the new Non-Spatial Data Tables is most appropriately done for the start of the new WMP cycle, to allow for consistency in 2022 quarterly reporting and to help minimize confusion in comparing Q3 and Q4 2022 QDRs.

Accordingly, the requirement to use the new Non-Spatial Data Tables for Q2 2022 quarterly submissions on February 1, 2023 would create numerous timing issues and inconsistencies and should be required for the Q1 2023 QDR instead. SCE and the other electrical corporations have submitted quarterly Non-Spatial Data Tables each quarter this year pursuant to the guidelines established for 2022. The Q4 submission should be no different to allow for consistent reporting of WMP performance across all 2022 quarterly reports.

#### **RECORDED DATA SHOULD BE BIFURCATED FROM FORECAST DATA IN REPORTING YEAR-END RESULTS**

With each WMP submission, the utilities present their proposed wildfire mitigation initiatives and annual compliance targets for these initiatives. The quarterly reports then provide a status on these annual compliance targets. Energy Safety also requires utilities to project certain metrics in the Non-Spatial Data Tables and also provide planned work for the quarter following the reporting period in the GIS Data submission. SCE believes the quarterly reports should report on the wildfire initiative goals outlined in the WMP whereas the WMP is the proper vehicle for utilities to present their wildfire mitigations and annual targets. While updated quarterly forecasts during the year can assist Energy Safety and stakeholders on changes to quarterly milestones, these projections should not extend beyond the current year. As such, the Q4 data submissions should focus on end-of-year recorded amounts and not on subsequent quarterly or annual projections. The Q4 quarterly report should report out on that year's recorded results whereas the WMP and Q1 quarterly report should present the next year's forecast and begin reporting out on that year's quarterly progress. Keeping separate the Q4 recorded and the subsequent year's and quarter's targets would significantly improve the efficiency and use of the quarterly reports.

#### **SUFFICIENT TIME IS NEEDED TO INCORPORATE NEW DATA REQUIREMENTS**

Notwithstanding the GIS data effective date with the Q1 2023 submission, the proposed revisions to the GIS Data Standard are substantially greater from previous Data Guidelines' changes and include additions and removals of entire feature classes, removal of most feature class log tables, and a number of additions and removals of

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<sup>3</sup> For example, see pages 79, 88, 149, and 153 of the Draft 2023-2025 WMP Technical Guidelines.

specific feature class data points. SCE's systems and business processes though require time to make data changes. SCE will attempt to meet the final effective dates but recommends Energy Safety explicitly state that new/revised Data Standard requirements and all subsequent versions that have new/revised requirements may not be able to be implemented in a short period of time but that continued improvements in meeting the GIS Data Standard are expected with each quarterly submission. Should SCE not be able to meet any of the changes/revisions by the final effective dates, it will state as such and provide the best known availability for when the new/revised data will be available.

**TABLE 12 SHOULD BE ELIMINATED BECAUSE IT IS DUPLICATIVE OF TABLE 1 AND THE CONCEPT OF MIDYEAR COMPLIANCE TARGETS HAS NOT BEEN PROPERLY VETTED**

In Section 4.3.12 of the Draft Data Guidelines, Energy Safety states that Table 12 is designed to track electrical corporations' achievement of their WMP initiative activity targets, for those initiative activities *where Energy Safety has indicated midyear targets are required*.<sup>4</sup> Energy Safety further states that only Asset Inspections, Vegetation Management, and Stakeholder Coordination (with regards to PSPS) must be reported relative to midyear targets, as indicated in the 2023-2025 WMP Technical Guidelines.<sup>5</sup> During the Data Guidelines Workshop, Energy Safety further explained that the intention of Table 12 was to capture only those initiatives with "midyear and annual" target compliance requirements whereas Table 1 was to capture all initiatives compliance requirements. The draft 2023-2025 WMP Technical Guidelines only mention midyear targets twice.<sup>6</sup> These two "mid-year" references are included in a short list of "potential" items that "may" be allowable for revisions for WMP Updates and that Energy Safety will issue separate guidelines for the WMP Updates that will include a final list of allowable items. WMP is an annual compliance process and should not include "midyear" compliance targets. Including a new table in the non-spatial data tables based on a conceptual "midyear" compliance target that has not been defined, discussed, nor open to comments is premature and should be removed. Moreover, Table 1 includes mitigation initiative mid-year quarterly progress updates on the annual targets, which is seemingly largely duplicative of the intent of Table 12 to track midyear compliance targets and could be integrated into Table 1 with a new column or two. Given that the concept of "midyear" compliance targets is premature and the fact that Table 12 is largely duplicative of Table 1, SCE recommends removing Table 12 at this time.

**SCE LOOKS FORWARD TO ENERGY SAFETY ADDRESSING THE QUESTIONS POSED AT THE DATA GUIDELINES WORKSHOP**

SCE and other utilities/stakeholders submitted several questions seeking clarification on the draft Data Guidelines for which Energy Safety informed it needed time to assess prior to providing a response. These included questions seeking clarification on the new audits feature class, resubmission of previous quarterly reports when new data and/or

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<sup>4</sup> Data Guidelines at p. 164 (emphasis added).

<sup>5</sup> Data Guidelines at p. 164.

<sup>6</sup> 2023-2025 WMP Process and Evaluation Guidelines at p. 26.

errors are identified, domain value restrictions, and other subject areas. SCE would appreciate responses to these clarifying questions as it finalizes the Data Guidelines.

**CONCLUSION**

SCE appreciates the opportunity to submit its comments on Energy Safety's Draft Data Guidelines. If you have any questions, or require additional information, please contact me at [Gary.Chen@sce.com](mailto:Gary.Chen@sce.com).

Sincerely,

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Gary Chen

Director

Safety & Infrastructure Policy