

May 26, 2023

Melissa Semcer
Deputy Director, Electric Infrastructure
Directorate
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, California 95814

Re: City of Moorpark Comments on SCE 2023–2025 Wildfire Mitigation Plan

Dear Deputy Director Semcer:

The City of Moorpark respectfully submits these comments on SCE’s 2023–2025 Wildfire Mitigation Plan. While Moorpark appreciates the improvements SCE has made to its wildfire mitigation programs year-over-year since 2019, and the continued improvements set forth in the WMP, Moorpark has identified some potential gaps in SCE’s system hardening and resiliency activities.

Microgrids and the Value of Service (Section 8.1.2.7)

Microgrids that operate during de-energization events can play a crucial role in mitigating outage impacts by ensuring that community resource hubs (e.g., “Main Street” areas with pharmacies, gas stations, grocery stores, etc.) and critical facilities remain operational. Despite this clear benefit, SCE has not identified a single microgrid site that it believes is cost-effective.¹ SCE’s cost analysis is based largely on a 2019 Nexant Value of Service Study, as well as on SCE’s own unexplained cost–benefit analysis.² SCE states that it will re-evaluate its approach, re-run its assessments, and look for microgrid partnership opportunities in 2023.³ Moorpark supports SCE’s return to the drawing board.

Based on the information available, Moorpark recommends that SCE update its assumptions and inputs for calculating both the value of service and the cost–benefit ratio for microgrids to reflect the cumulative impacts on frequently de-energized circuits and the economic impacts of outages in the post-COVID reality of increased remote work. The 2019 Nexant Value of Service Study

¹ SCE 2023-2025 WMP, p. 271.

² *Ibid.*

³ *Ibid.*

is based on data collected between December 2018 and June 2019—before SCE’s de-energization program was widely deployed and before the pandemic.⁴ Given the significant changes to grid reliability, local economies and workforces, and our daily lives since the study was issued, it is not clear that the underlying assumptions or value of service calculations are adequate to estimate the financial value of a microgrid in 2023.

It is also not clear that either Nexant’s or SCE’s value calculations consider the on-the-ground impacts of repeated and extended power outages on communities. To truly gauge the potential value of a microgrid, SCE must understand the cumulative costs of multiple outages, particularly on vulnerable individuals, as well as the costs to the local economy from business closures, lost hourly wages, lost funding for school attendance, large-scale food spoilage, etc. De-energization outage patterns have emerged since 2019, with a fairly reliable roster of communities and circuits that are frequently impacted; SCE should be able to work with those communities to understand the on-the-ground economic impacts of de-energization events and to reconsider the value of microgrids to those communities.

Frequently De-Energized Circuits (Sections 9.1.2, 9.1.5, Appendix F5: Continuation of Section 9 - PSPS)

Two of Moorpark’s circuits that are notorious for de-energization outages, Strathern and Morganstein, do not appear on SCE’s table of frequently de-energized circuits.⁵ When Moorpark followed up directly with SCE for an explanation of the circuits’ absence from the table and for information on planned system hardening measures to reduce outages, SCE indicated that reliability work on the Strathern circuit is complete and is expected to reduce customer outage time by 55% under historical weather conditions. SCE installed 3.3 miles of covered conductor, installed one new weather station, and implemented operational protocols to raise the de-energization threshold on the circuit. Moorpark appreciates SCE’s efforts to harden the Strathern circuit and hopes the outage reductions are as robust as SCE predicts.

The Morganstein circuit, on the other hand, is apparently slated for improvements of some kind but the actual work to be performed has not yet been specified. The communities served by the Morganstein circuit are keenly aware of its outage frequency, and the lack of planned system hardening for the circuit raises questions about SCE’s process for prioritizing work on frequent-flier circuits. Moorpark requests that SCE amend its WMP to include a workplan for hardening the Morganstein circuit, as well as any other frequently impacted circuits that were not included in the original WMP.

Targeted Undergrounding (Section 8.1.2.2.1)

Moorpark recommends that SCE consider expanding the scope of its undergrounding activities to address fire risk and resiliency issues on lines outside of the Severe Risk Areas, given that the CPUC intends to discontinue the Rule 20A undergrounding program.⁶ Moorpark, which is

⁴ See A.19-08-013, Exhibit No. WP SCE-02, Vol. 04, Pt. 01, Ch. II, Book A, pp. 18, 20.

⁵ SCE 2023–2025 WMP, Appendix F5: Continuation of Section 9 – PSPS, pp. 859–869.

⁶ R.17-05-010, *Proposed Phase 2 Decision Revising Electric Rule 20 and Establishing Local and Tribal Government Consultation Requirements* (May 5, 2023).

regularly impacted by de-energization events and is located in a High Fire Threat District, lacks the accumulated credits to underground a single mile of overhead lines; because credit allocations are discontinued and the Rule 20A program is winding down, Moorpark cannot undertake a project that will meaningfully improve reliability or reduce wildfire risk. The CPUC's new proposal to require the utilities to consult with local and tribal governments regarding planned undergrounding projects may help close the current gap between utility infrastructure project planning and local community needs, but consultation does not necessarily translate into action.

Moorpark understands SCE's reasons for proposing a narrowly targeted undergrounding program for its highest risk circuits, given the expense, longer project timelines, and potential terrain challenges inherent in undergrounding. But given the lack of a clear plan for hardening the Morganstein circuit, and the less-than-100% de-energization impact reduction from the upgrades to the Strathern circuit, Moorpark recommends that Energy Safety encourage SCE to consider undergrounding circuits outside Severe Risk Areas where undergrounding would reduce fire risk and improve reliability.

Conclusion

Moorpark appreciates Energy Safety's diligence in overseeing the large utilities' Wildfire Mitigation Plans. The City also appreciates the opportunity to provide comments on SCE's 2023–2025 WMP.

Sincerely,

DOWNEY BRAND LLP



Megan J. Somogyi

MJS

cc: Hon. Chris Energren, Mayor, City of Moorpark
Renee Delgado, Councilmember, City of Moorpark
Daniel Groff, Councilmember, City of Moorpark
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