Gary Chen
Director
Safety & Infrastructure Policy
Gary.Chen@sce.com

Docket# 2023-WSRR

July 28, 2023

Lucy Morgans
Program Manager, Electric Safety Policy Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Comments Regarding Public Workshop on Safety Requirements to Address Increasing Wildfire Risk from Climate Change and Aging Infrastructure

Dear Program Manager Morgans:

Southern California Edison Company (SCE) appreciates the opportunity to submit comments following the public workshops to consider Safety Requirements to Address Increasing Wildfire Risk from Climate Change and Aging Infrastructure held on July 13, 2023 and July 14, 2023. Below, SCE provides general comments with respect to the wide-ranging discussion during the workshop of potential changes to California Public Utility Commission (CPUC, Commission) rules, followed by comments to participant and public feedback on specific discussion categories.

General Comments

SCE appreciates the Office of Energy Infrastructure Safety's (Energy Safety's) efforts to obtain input from SCE, the public, and other stakeholders in the development of recommendations for potential modifications to Commission rules and regulations to further address current or future wildfire risk due to climate change. The breadth of categories discussed at the workshop was wide-ranging. Thus, SCE recommends that this workshop be considered as a valuable first step in evaluating potential modification to existing regulations to help focus future evaluations. Because CPUC General Orders (GO) 95 and 128 dictate the minimum requirements for constructing, operating and maintaining electric and communication systems, modifications to General Order rules require substantive review and diligence similar to their original development. The rules and regulations contained within the current General Orders "embody the results of extensive investigations and mature study … in which all branches of the electric industry have taken part … and reflect long years of experience gained in the construction,

operation and maintenance of overhead electric lines of all types."[1] SCE welcomes the opportunity to further engage with the CPUC, Energy Safety, the electrical corporations, and other stakeholders to further evaluate and refine relevant proposals presented and discussed at the workshop.

SCE sees value in further exploring certain other concepts and ideas raised at the workshop. SCE recommends further exploration into how the observations and feedback presented at the workshop may address current and future changes in technology, cost impacts, system designs, and other factors. For example, it is important for GO rule modifications to account for potential advancements in technology and variation within or across electrical corporation service areas (e.g., topography, climate) over time. As a hypothetical example, a proposed rule change that seeks to prescribe a specific technology or product (e.g., a drone) be used to conduct aerial inspections of overhead assets may ultimately preclude the use of more effective options in the future when/if such options are developed (e.g., satellite imagery). An alternative approach would be to evaluate the necessity of adding a requirement to inspect overhead assets aerially, without specificity as to which technology should or could be used to perform those inspections.

As the observations presented at the workshop are further evaluated, SCE also encourages such reviews to evaluate the costs to implement and maintain them. The rules and regulations in the General Orders serve as the minimum requirements for how utilities should construct, operate and maintain the grid; these requirements can often require costs to implement, and potentially ongoing operations and maintenance costs to sustain. For example, if a requirement was established that required HD cameras to be installed at a certain geographic resolution, utilities would not only incur upfront costs to deploy the HD cameras, but also ongoing costs to operate and maintain the cameras each year. Both types of costs should be considered when evaluating potential recommendations. These costs should also be considered in relation to the benefits that the requirement intends to provide.

Finally, as the observations and topics raised at the workshop are further evaluated and refined, consideration of the best regulatory vehicle by which to effectuate changes will be important. Revising General Orders may or may not be the appropriate avenue. There are numerous active proceedings at the CPUC and ongoing workshops through Energy Safety's WMP process that can further explore and establish best practices to address ideas and observations. In many cases, alternative avenues could be more appropriate for relatively nascent topics like climate risk modeling, where the science is still developing and there is substantial change in data and approaches year-to-year.

[1] *See* January 2020 GO95, Preface, p. x, available at https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M338/K730/338730245.pdf

SCE provides additional comments on select categories below. Omission of comments on Energy Safety's specific observations or recommendations does not imply SCE's agreement or disagreement.

Comments on Selected Categories

Local Conditions

This category evaluated the effects of local conditions on how electrical infrastructure is constructed and maintained. SCE agrees that different parts of utility service areas have different climatology, weather conditions, topography, and risk profiles, and that these different conditions may necessitate the application of different equipment or operating practices across areas. In fact, the incorporation of local conditions is a key tenet of SCE's Integrated Wildfire Mitigation Strategy, which guides much of our wildfire mitigation plan activities. SCE is available to further discuss local conditions, particularly as it relates to how to mitigate wildfire and climate risks. Additional considerations, such as those related to geohazards, should also be considered. SCE notes that local conditions can change over time, and that is something that any future requirements should address.

Risk Assessment and Modeling

SCE appreciates the discussions at the workshop related to risk assessment and modeling. This is a broad topic area that requires in-depth discussion of policy-level matters and detailed evaluation of very technical modeling approaches. Regarding the discussion at the workshop about standardizing risk assessment and modeling, SCE recommends focusing first on opportunities to standardize what utilities need to model, rather than how utilities must model. For example, further discussion could consider what failure modes or drivers are important for all utilities to evaluate, and which assets should be modeled.

Finally, SCE notes that there are several existing forums that are evaluating risk assessment and modeling: Energy Safety has commissioned several working groups related to risk modeling and assessment; similarly, the CPUC continues to advance risk assessment practices through its Risk Assessment Mitigation Phase (RAMP) process and multi-phased Risk rulemaking. Several of the points raised in the workshop could reasonably be considered as part of these existing forums or proceedings.

System Hardening

SCE is actively hardening its system to mitigate wildfire risks and public safety power shutoff (PSPS) impacts to its customers. Through our initial Climate Adaptation and Vulnerability Assessment report, we are actively developing and implementing plans to prepare our electric system and operations for the short, medium, and long-term impacts of climate change. We would welcome further discussion with Energy Safety, the CPUC, and stakeholders to share our plans and identify further opportunities in these areas.

The workshop also discussed safety factors as it relates to system hardening. SCE supports further discussion on this topic but notes that GO95, Rule 44.2 already addresses allowable reductions in safety factors for poles and other overhead line elements. As previously mentioned, requiring more stringent safety factors may lead to increased costs and limited flexibility to adapt to new information and analysis over time.

Asset Replacement and Inspections

For the last several years, SCE has designed and implemented risk-informed inspection programs within its high fire risk areas (HFRA). This approach assigns a risk score to each structure in HFRA, and an associated inspection schedule for each asset. This allows for relatively higher risk structures to be inspected more frequently than structures with relatively lower risk. Within this framework, SCE still ensures that all structures are inspected at least as frequently as required by GO165. In addition, SCE has started risk-prioritizing the remediation work that results from these inspections, moving beyond the schedule-based requirements in the General Order.

As discussed in the workshop by SCE and other stakeholders, it would be worthwhile to further evaluate if and how General Order 165 could advance beyond a schedule-based approach to one that further incorporates a risk-based approach to inspections and remediation work. There are many variables to consider in such a transition, including how to maintain requisite flexibility in the calculation of risk, how to provide exceptions for lower risk remediation work to extend beyond current deadlines so that higher risk work can be completed first, and how to establish a framework that is able to adapt over time as our understanding of wildfire and climate risks evolves. SCE also believes further discussion is warranted on the potential benefits in allowing utilities to defer remediation work – where safe to do so – when a more comprehensive hardening project is scheduled to be performed on that same structure and within a reasonable timeframe after the remediation due date.

CONCLUSION

SCE appreciates the opportunity to provide feedback on the workshop considering Safety Requirements to Address Increasing Wildfire Risk from Climate Change and Aging Infrastructure. If you have questions, or require additional information, please contact me at gary.chen@sce.com.

Sincerely,
//s//
Gary Chen
Director, Safety & Infrastructure Policy