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Shannon O'Rourke
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Docket# Compliance Guidelines

SUBJECT: Southern California Edison Company – Comments on Draft Compliance Guidelines Version 2

Dear Deputy Director O'Rourke:

Southern California Edison Company (SCE) appreciates the opportunity to provide comments on Version 2 of the Office of Energy Infrastructure Safety's (Energy Safety) 2023 Draft Compliance Guidelines (Draft Guidelines) that were released for public review and comment on August 10, 2023. Although SCE generally supports the Draft Guidelines, SCE has provided limited comments below on important issues which do not appear to have been addressed in the changes from Version 1 to Version 2 of the Draft Guidelines.¹ SCE continues to support all of its initial comments, but for brevity focuses on the issues below.

COMMENTS

The Term "Commitment" Should Be Replaced with Established Terminology

Version 1 of the Draft Guidelines broadly defined the term "Commitment" as "an action that the electrical corporation states it will or plans to accomplish within the compliance period. The commitment may be quantitative or qualitative in nature."² In its comments on Version 1 of the Draft Guidelines, SCE explained that the definition of the term "Commitment" is vague, and the use of that term throughout the Draft Guidelines is therefore a potential source of confusion.³ To avoid confusion and inconsistencies with other regulatory filings, SCE recommended that the term "Commitment" be replaced by established terminology such as "Initiative" or "Target."⁴ In Version 2 of the Draft Guidelines, Energy Safety added that "Commitments include targets."⁵ This overlap between a "Commitment" and "Target" further highlights the redundancy of the term "Commitment" and the ambiguity in its definition. SCE respectfully renews its recommendation that the term "Commitment" be removed from the Draft Guidelines and replaced with established terminology.

¹ SCE incorporates by reference its July 10, 2023 Comments on Version 1 of the Draft Guidelines.

² Version 1 of the Draft Guidelines (June 20, 2023), p. 3.

³ July 10, 2023 SCE Comments on Version 1 of the Draft Guidelines, pp. 1, 4.

⁴ *Id.*

⁵ Version 2 of the Draft Guidelines, p. 3, Section 2.0.

Compliance Assessment Should Remain Focused on Initiatives Rather than “Objectives” or “Commitments”

Like Version 1 of the Draft Guidelines, Version 2 continues to introduce new requirements for utilities to provide detailed assessments of their progress toward completing the three-year objectives identified in their WMPs.⁶ Given that multi-year objectives were created to guide SCE’s wildfire mitigation efforts over the course of the 2023-2025 WMP period, the majority of the objectives within the three-year category have multi-year timeframes for completion and are ill-suited for yearly compliance review. In its comments on Version 1 of the Draft Guidelines, SCE explained that WMP compliance assessment should focus on whether electrical corporations substantially completed their WMP initiatives rather than “objectives” or “commitments.”⁷ SCE respectfully renews its comments on Section 4.0 of the Draft Guidelines, which are necessary to make the annual report on compliance consistent with previous compliance reviews, AB 1054 legislation, relevant statutes, and the independent evaluator scope of work.⁸

The Section 7.1 Evaluation Criteria Should Be Modified

SCE appreciates Energy Safety’s revisions to Section 7.1 of the Draft Guidelines, which provide a list of criteria that Energy Safety proposes to consider as part of its annual report on compliance. Criterion six in Version 1 of the Draft Guidelines was not modified in Version 2. That criterion appears to consider any number of issues related to “execution, management, or documentation in the implementation” of a WMP.⁹ As SCE noted in its comments on Version 1 of the Draft Guidelines, this language is unclear because of its breadth and vagueness, and would introduce undue subjectivity into the compliance assessment by casting a broad net across any number of issues. SCE renews its recommendation for the following revision to that criterion:

In the course of assessing the electrical corporation’s substantial compliance with its WMP, whether the electrical corporation exhibited issues related to its execution, management, or documentation in the implementation of its WMP that impacted Energy Safety’s ability to complete the assessment process. This analysis may expand beyond the scope of any single WMP initiative.

CONCLUSION

SCE appreciates the opportunity to provide these comments on Version 2 of Energy Safety’s 2023 Draft Compliance Guidelines. If you have questions, or require additional information, please contact Liz Leano at Elizabeth.Leano@sce.com.

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

⁶ Version 2 of the Draft Guidelines, pp. 8-9, Section 4.0, ¶¶ 1(a)-(c).

⁷ July 10, 2023 SCE Comments on Version 1 of the Draft Guidelines, pp. 2-3.

⁸ *Id.*

⁹ Version 2 of the Draft Guidelines, p. 16, Section 7.1, ¶ 5.