

Docket #: 2023-IE

August 25, 2023

Suzie Rose  
Program Manager, Compliance Assurance Division  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**SUBJECT:** Comments of Southern California Edison Company on 2022 Wildfire Mitigation Plan Independent Evaluator Annual Report on Compliance

Dear Program Manager Rose:

Southern California Edison Company (SCE) provides its comments to the Independent Evaluator (IE) Annual Report on Compliance (ARC or IE Report) with SCE's 2022 Wildfire Mitigation Plan (WMP) prepared by NV5/Guidehouse.

#### **INTRODUCTION**

SCE appreciates the opportunity to provide comments to the IE Report. SCE recognizes the effort required of the NV5/Guidehouse team to conduct this extensive review within the allotted timeframe and the level of collaboration achieved to complete it on time.

Overall, the IE determined that "SCE is substantially compliant with its WMP" and that "Except as otherwise noted, SCE is implementing its WMP initiatives as described in its WMP"<sup>1</sup>.

Regarding the review of costs incurred to implement SCE's 2022 WMP, the IE determined "SCE is largely funding its programs appropriately, with some noted exceptions"<sup>2</sup> and the "IE verified that the funding presented ... is being tracked appropriately"<sup>3</sup>. The IE additionally determined that "SCE is performing the QA/QC work as described in the WMP and associated documents...[and] has a robust QA/QC program that should continue to ensure SCE's wildfire mitigation activities are effectively performed"<sup>4</sup>.

The following sections include comments to: (1) the characterization of activities where costs were less than forecast as "underfunded"; (2) observations the IE noted; and (3) advancing the date for publication of the list of qualified IE reviewers.

---

<sup>1</sup> IE Report, p. 77.

<sup>2</sup> IE Report, p. 77.

<sup>3</sup> IE Report, p. 73.

<sup>4</sup> IE Report, p. 76.

### **(1) SCE COMMENTS TO WMP INITIATIVES FOUND “UNDERFUNDED”:**

The IE Report identified several activities for which total incurred costs were less than the levels originally forecast in SCE’s 2022 WMP<sup>5</sup>. In its 2022 WMP Annual Report on Compliance, SCE provided explanations detailing the circumstances that led to these variances. The IE Report uses the terminology “underfunded amount” to identify recorded costs that are less than the original forecast amounts. The term “underfunded” suggests that SCE did not provide sufficient funding for an initiative and did not complete the targeted scope. This is not the case. In fact, SCE funded activities to the extent needed to meet the targets. For all but one of its 39 WMP initiatives, SCE achieved the performance targets established in the WMP. In the one instance where SCE did not fully meet an initiative’s WMP target, this was not driven by an “underfunding” of those initiatives. Though SCE allocated funding to each initiative, as indicated in its WMP, other factors affected performance throughout the year as described in Table 2-6 of the IE Report.

SCE’s primary objective in implementing its approved 2022 WMP was to reduce wildfire and PSPS risks efficiently and effectively. The performance of SCE’s 2022 WMP initiatives reflects that. Further, in those instances where SCE achieved an initiative’s target while spending less than originally forecast, SCE is reducing risk at a lower cost to customers. Spending less than forecast does not equate to “failed to fund”<sup>6</sup> and should not be considered a basis for a finding of non-compliance. While the relevant statute does not discuss spending efficiency, it would be unreasonable to penalize SCE and other utilities for efficient spending, particularly where targets are met.

### **(2) SCE COMMENTS TO IE OBSERVATIONS**

#### **Response to SH-10 “gap in controls”**

While verifying compliance with the SH-10 Tree Attachment Remediations initiative, the IE noted the following regarding an associated data request response: “SCE had accounted for 99 remediations that were burned trees from 2020 or 2021. After those trees were burned, they were reassigned to a different work order, which SCE then included as part of the 2022 tree attachment remediation work. The IE reviewed the response and determined, although there were 99 remediations inadvertently included in the documentation, SCE still completed the target of remediating 500+ tree attachments. The IE has identified a gap in controls for data accuracy and tracking, and recommends SCE develop additional controls to ensure the accuracy of the information and data being used for accounting for the work completed.”<sup>7</sup>

In order to ensure this type of issue is mitigated going forward, SCE has enhanced its controls to validate SH-10 Tree Attachment Remediations data at the more detailed *structure* level instead of the higher *work order* level, which will help prevent recurrence of this issue.

---

<sup>5</sup> IE Report, Table 2-6: Verification of Funding

<sup>6</sup> PUC Section 8386.3(c)(2)(B)(i): “As a part of the independent evaluator's report, the independent evaluator shall determine whether the electrical corporation failed to fund any activities included in its plan.”

<sup>7</sup> IE Report, pp. 18-19.

### **Response to QDR GIS data coordinates concerns for SH-4 and SH-14**

The IE stated that while performing field verifications of SH-4 Branch Line Protection Strategy and SH-14 Long Span Initiative, “[we] did identify concerns with the location data for some of the activities ... and thus caused delays and issues with the verifications.”<sup>8</sup> Specifically, for SH-4, the IE stated they “were unable to locate or access 16 fuse locations due to the GIS QDR data location coordinates not providing the complete location detail or being located on private third-party property.” and for SH-14 the IE stated that “using the GIS QDR data, however, [they] were unable to locate or access 11 sampled items due to incomplete location data or private property limitations.”

Regarding the private property limitations, SCE made personnel available that were willing to assist the IE with any access issues they encountered during their field verification efforts. The IE ultimately did not utilize the personnel for accessing the private property.

Regarding the IE’s observation on the GIS data from the Quarterly Data Reports (QDR), which the IE utilized to perform field verifications, the IE additionally requested and received year-end completion and location data (“2022 SCE Year-end Compliance Reports, as applicable – [non-Energy Safety documentation as discussed on kickoff call]”)<sup>9</sup> for each field verifiable WMP initiative. This information would have been better suited than GIS data from the QDRs for the performance of field verification following completion of the 2022 compliance year. There are limitations to using the QDR GIS data for purposes of the IE review, as was communicated to the IE during the kickoff meeting, that SCE will detail here.

QDR data submitted to OEIS only provides information in support of work performed in the applicable reporting quarter and does not represent a complete year-to-date view of all activities. Since the QDR submission deadline is 30 days after the applicable reporting period, some activity data may not be available at the time of submission due to internal data and work closure processes. If OEIS requested a year-to-date view of the QDR, the IE would have a more complete dataset of annual activity data for field validations. The latitude/longitude decimal limit required as part of the submittal instructions for the 2022 QDRs may have also contributed to the difficulty in locating structures using the QDR data.

SCE has implemented a new tool called Wildfire Safety Data Management (WiSDM) that will help address some of the QDR limitations described above. WiSDM improves the data collection and transformation process required by the QDR. WiSDM also improves the ability to validate geometry for all wildfire activity data and improves the accuracy of QDR submissions.

### **(3) SCE COMMENTS TO THE ADVANCEMENT OF PUBLICATION DATE OF THE INDEPENDENT EVALUATOR LIST**

Energy Safety’s Draft Compliance Guidelines (Compliance Guidelines) provide that “Energy

---

<sup>8</sup> IE Report, p. 22.

<sup>9</sup> IE Report, Table 3-1: List of Data Requests

Safety must annually publish a list of independent evaluators with experience assessing the safe operation of electrical infrastructure before March 1.”<sup>10</sup> Given the relatively short timeframe under which independent evaluator reviews take place, SCE suggests that the Compliance Guidelines advance the date when Energy Safety publishes the list of approved independent evaluators from “before March 1” to February 1. The additional month would greatly improve the IE review process. For example, publishing the list of qualified IEs would afford electrical corporations additional time to issue requests for pricing to the IE firms, properly consider options, negotiate and finalize necessary contracts, initiate the evaluation, and orient the IE to the WMP initiatives. Advancing the time when the list of qualified IEs is published would also provide independent evaluators with increased time to become familiar with the WMP, perform discovery, and draft and finalize the IE report.

### **CONCLUSION**

SCE appreciates the opportunity to submit this response to the IE Report prepared by NV5 and looks forward to working with Energy Safety and other Parties to help improve the IE Review process going forward.

Please direct any questions or requests for additional information to Liz Leano (Elizabeth.Leano@sce.com) and Johnny Parker (Johnny.Parker@sce.com).

Sincerely,

//s//

Gary Chen  
Director, Safety & Infrastructure Policy  
gary.chen@sce.com

---

<sup>10</sup> Draft Guidelines, p. 11.