

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE STATE OF CALIFORNIA**

**OPENING COMMENTS OF THE UTILITY REFORM NETWORK
ON THE DRAFT DECISION ON SOUTHERN CALIFORNIA EDISON COMPANY'S
2023-2025 WILDFIRE MITIGATION PLAN**



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The Utility Reform Network (“TURN”) submits these comments on Energy Safety’s August 30, 2023 Draft Decision on the 2023-2025 Wildfire Mitigation Plan (WMP) submitted by Southern California Edison Company (“SCE”).

I. INTRODUCTION AND SUMMARY

Energy Safety’s Draft Decision would approve SCE’s 2023-2025 WMP, but not without pointing out significant problems with SCE’s approach to wildfire mitigation. Among those problems are SCE’s practice of “default[ing] to undergrounding” and failing to “perform adequate analysis of alternative mitigation plans.”¹ Despite Energy Safety’s finding that SCE’s decision-making process unduly favors undergrounding at the expense of the faster-to-deploy and less costly overhead hardening alternative, the Draft Decision would not require SCE to make any changes to its grid hardening plans until its 2025 Update. This is a plainly insufficient remedy for a serious deficiency in SCE’s WMP. Until SCE fixes its approach to grid hardening, it will rely too much on undergrounding -- with its long implementation schedule and uncertainty about where it will prove feasible -- instead of the proven and more quickly implemented covered conductor mitigation. Both safety and cost-effectiveness will suffer.

Instead of deferring any further scrutiny of SCE’s grid hardening plans to the 2025 Update, Energy Safety should require SCE to make the necessary corrections to its grid hardening selection approach in this WMP (which covers at least 2023 and 2024) and revise its undergrounding and covered conductor targets before approving this WMP. Alternatively, and

¹ Draft Decision, Area of Continuing Improvement (ACI) 23-09, p. 88; *see also* pp. 41-42.

at the very least, Energy Safety should include in its final decision a clear statement that its approval of this WMP does not constitute specific approval of SCE's undergrounding target miles and that it expects SCE to make the corrections to its decision-making process and the scope of its various grid hardening activities immediately.

In addition, as discussed in Section IV below, Energy Safety should modify Appendix D to more accurately reflect the contributions of intervenors to this proceeding.

II. THE DRAFT DECISION APPROPRIATELY CRITICIZES SCE'S APPROACH FOR SELECTING AMONG GRID HARDENING ALTERNATIVES

The Draft Decision correctly finds that there are serious problems with SCE's grid hardening decision-making approach. The most serious problems are described in Section 8.1.2.3:

SCE states that it is prioritizing undergrounding projects within its SRA [Severe Risk Areas]. SCE explains that it has scoped its remaining unhardened lines after 2024 within its SRA for undergrounding in 2025-2028. While SCE is undertaking vegetation management and inspection measures as interim mitigations, *these actions leave unaddressed wildfire risk in its SRA*. SCE has not demonstrated that it accounted for alternative solutions *that take less time to implement, such as covered conductor in combination with other mitigations*, as seen in Table 8.1-2 below.

Additionally, SCE has not developed a robust mitigation selection process for system hardening *and instead defaults to undergrounding for its SRA*. Mitigation selection *should consider a variety of location-specific factors, such as how long it takes to deploy the solution, effectiveness at mitigating particular ignition drivers in a given location, feasibility given terrain and access challenges, and the cost-benefit analysis*.

In addition to not considering location-specific factors, by defaulting to undergrounding, *SCE is missing an opportunity to gain mitigation efficacy by combining mitigation activities* (e.g., REFLC with CC++). See Table 8.1-2 for SCE's mitigation portfolio efficacy, noting how combined mitigations could achieve the same efficacy as undergrounding alone with faster deployment and lower cost.²

² Draft Decision, pp. 41-42 (emphasis added, footnote omitted).

To summarize the major shortcomings described in these findings:

- SCE does not take into account the time value of risk associated with the longer time required to deploy undergrounding compared to covered conductor; and
- SCE defaults to undergrounding, rather than examining whether which risk drivers are present in a given location and which mitigation can most efficiently address those drivers.
- SCE fails to take advantage of efficiencies that can be achieved when using covered conductor combined with other current limiting technologies, such as REFCL.

These findings are well supported by the evidence, including the evidence presented in TURN's comments on SCE's WMP, which showed that SCE's process presumes that undergrounding will be the best alternative in SRAs without considering specific local conditions, and the fact that SCE does not examine which alternative would be most cost-effective in a given location.³

These deficiencies have significant adverse consequences. First and most important, they "leave unaddressed wildfire risk in [SCE's] SRA."⁴ This concern goes to the heart of what WMPs are supposed to address – that the utility is taking appropriate measures to mitigate risks in the time period under review. Energy Safety correctly finds that SCE's approach unduly jeopardizes safety by failing to ensure that appropriate mitigations are targeted to the highest risk locations as quickly as possible. Second, SCE's approach makes it likely that SCE is using the expensive and slow-to-deploy undergrounding mitigation when much less costly overhead hardening is adequate. The result is that ratepayers are subject to paying for an inefficient mitigation, which drives up the cost of electricity needlessly.

³ TURN May 26, 2023 Comments on SCE's 2023-2025 WMP, pp. 2-6.

⁴ Draft Decision, p. 41.

III. THE IDENTIFIED FAILINGS IN SCE'S GRID HARDENING SELECTION PROCESS NEED TO BE CORRECTED IMMEDIATELY

The Draft Decision correctly identifies serious problems with SCE's grid hardening selection approach and the harm that can be expected to result – both to system safety and cost-effectiveness. Nevertheless, the Draft Decision fails to require the appropriate urgency in SCE's response. Even though ACI 23-09 contemplates that correcting those shortcomings could affect the scope of the selected hardening alternatives, SCE is not required to show how, if at all, its choice of mitigation activities has changed until its 2025 Update.⁵

As the Draft Decision recognizes and as discussed in the previous section, both the safety and cost-effectiveness of SCE's mitigation plan is imperiled until these failings are corrected. To ensure that SCE adopts the best grid hardening strategy without delay, Energy Safety should require SCE to remedy the problems discussed in Section II, reflected in ACI 23-09, before its WMP can be approved. A WMP with such fundamental deficiencies that undermine wildfire safety simply does not warrant approval. Deferring approval until the deficiencies in SCE's grid hardening selection approach will ensure that they are corrected and that SCE pivots as quickly as possible to a more appropriate and more limited use of undergrounding.

Alternatively, and at the very least, Energy Safety should include in its final decision a clear statement that its approval of this WMP does not constitute specific approval of SCE's undergrounding target miles and that it expects SCE to make the corrections to its decision-making process and the scope of its various grid hardening activities immediately. Energy Safety should specify a due date for SCE to implement the changed scope of its grid hardening programs -- within three months after Energy Safety's final decision.

⁵ Draft Decision, ACI 23-09, p. 88.

IV. ENERGY SAFETY SHOULD CORRECT AND CLARIFY ITS DISCUSSION OF INTERVENOR CONTRIBUTIONS IN APPENDIX C

Appendix C to the Draft Decision, which references stakeholder comments on the large IOU WMPs, requires correction and clarification.

First, the list of stakeholders submitting comments on the utility WMPs inadvertently omits TURN, which submitted timely comments on each of the large IOU WMPs. TURN should be added to this list.⁶

Second, in identifying topics that intervenors addressed that Energy Safety found particularly useful, Appendix D contains the prefatory statement: “Energy Safety found the following stakeholder comments to concur with topics already included in Energy Safety’s findings.” As phrased, the implication is that Energy Safety did not need any of the input from intervenors on these issues and would have arrived at its conclusions regardless of these intervenor comments. TURN doubts this was Energy Safety’s intent. Instead, TURN suspects page 2 of the Draft Decision better reflects the agency’s view in stating that Appendix D provides a list of stakeholders that submitted comments, “including comments that Energy Safety concurred with and incorporated into its evaluation.”⁷

To more accurately reflect and encourage the important contributions of intervenors to these WMP proceedings, TURN agrees with Mussey Grade Road Alliance (MGRA) that the statement in Appendix D should be changed to: “Energy Safety found that the following stakeholder comments informed and contributed to its findings . . .”⁸

⁶ Energy Safety Draft Decision, App. C, p. A-0. The subsequent list on page A-1 that identifies areas of contributions by intervenors correctly lists TURN.

⁷ Draft Decision, p. 2.

⁸ MGRA Comments on SDG&E and SCE Draft Decisions, Sept. 19, 2023, p. 7.

V. CONCLUSION

For the reasons set forth above, TURN urges Energy Safety to adopt the recommendations in these Comments.

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Respectfully submitted,

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