

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

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

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

I. ENERGY SAFETY SHOULD NOT REVISE ACI 23-09

SCE’s opening comments (p. 4) object to Energy Safety’s finding that SCE does not perform adequate analysis of overhead hardening alternatives and instead defaults to undergrounding. SCE’s assertions are without merit.

As TURN pointed out in its May 26, 2023 comments on SCE’s WMP, in SCE’s self-designated severe risk areas (SRA), SCE presumes that undergrounding is the preferred alternative and only considers overhead hardening if specific terrain or local issues *require* use of such an alternative.¹ In other words, in SRAs, SCE defaults to undergrounding.

Further evidence that SCE defaults to undergrounding in SRAs is supplied by the fact that SCE does not calculate project-level RSEs to compare the cost-effectiveness of undergrounding with overhead alternative hardening alternatives.² Energy Safety is right to describe SCE’s decision-making process as “inadequate” and should not make the changes SCE requests.

¹ TURN May 26, 2023 Comments on SCE’s 203-2025 WMP, pp. 3-4, quoting SCE’s WMP, p. 205.

² *Id.*, p. 5.

II. CONCLUSION

For the reasons set forth above, Energy Safety should reject SCE's challenges to the Draft Decision. In addition, TURN continues to urge Energy Safety to adopt the recommendations in TURN's opening comments on the SCE Draft Decision.

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Respectfully submitted,

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