January 16, 2024 **VIA ELECTRONIC FILING**

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Subject: Comments of the Public Advocates Office on the Draft Data Guidelines Version 3.2

Docket: 2023-2025-WMPs

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments regarding the Draft Data Guidelines Version 3.2 published on December 15, 2023.

Please contact Nathaniel Skinner (Nathaniel.Skinner@cpuc.ca.gov) or Henry Burton (Henry.Burton@cpuc.ca.gov) with any questions relating to these comments.

We respectfully urge the Office of Energy Infrastructure Safety to adopt the recommendations discussed herein.

Respectfully submitted,

/s/ Marybelle C. Ang
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Attachment

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I. INTRODUCTION

On December 15, 2023, the Office of Energy Infrastructure Safety (Energy Safety) issued Draft Data Guidelines Version 3.2 (Draft Data Guidelines) for wildfire mitigation plan (WMP) submissions in 2024.[1] Pursuant to the cover letter of the Draft Data Guidelines, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these comments.

II. DATA GUIDELINES SECTION 4: TABULAR WILDFIRE MITIGATION DATA

A. Energy Safety should revise the non-spatial data tables for enhanced reporting and analysis (Section 4.3: Tabular Wildfire Mitigation Data Schema).

The proposed revisions below aim to simplify the non-spatial data tables by reducing reporting burdens for utilities and enhancing stakeholders' ability to analyze large data sets. The revisions proposed here by Cal Advocates will also allow Energy Safety and stakeholders to assess a utility's quarterly WMP performance more efficiently, leading to a more dynamic and thorough analysis. Furthermore, these changes are more than administrative tweaks; they represent a shift towards a more focused and efficient approach to utility wildfire mitigation program oversight:

- All tables – Energy Safety should retain historical data. Excluding this data could obscure long-term trend analysis and complicate the examination of data over extended periods.[2]
- Table 1 and Table 11 (Section 4.3.1 & 4.3.11) – To enable adequate cross referencing, Energy Safety should require a column identifying the risk model version used to determine mitigation activities (e.g., selection of project locations, prioritization of projects, and scope) within each initiative.
- Table 2 (Section 4.3.2: Performance Metrics) – Energy Safety should require the utilities to report time between inspection and corrective action in days, not hours,[3] consistent with General Order 95, Rule 18.[4]

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[1] Energy Safety, *Draft Data Guidelines Version 3.2*, December 15, 2023 (Draft Data Guidelines); Energy Safety, *Proposed Energy Safety QDR WM Data Tables 1 – 15 v3.2*, December 15, 2023 (Draft Data Tables).

[2] Draft Data Guidelines, Section 4: Tabular Wildfire Mitigation Data at 149 - 172.

[3] Draft Data Tables, Tab "Table 2" at Rows 70-117 and Column P.

[4] California Public Utilities Commission, General Order 95, Rule 18.

- Table 5 (Section 4.3.5: Risk Event Drivers) – If historical data is no longer required, Energy Safety should delete the instructions for the table as the instructions are no longer relevant.[5]
- Table 7 (Section 4.3.7: State of Service Territory and Equipment) – Energy Safety should add a section of rows with the title "Overhead Conductor Removed." Wildfire risk reduction comes from removing overhead conductor, not installing underground conductor. The current table includes "net conductor added," which does not provide the granularity needed to determine the ratio between miles of overhead conductor removed and miles of underground conductor added.
- Table 7 (Section 4.3.7: State of Service Territory and Equipment) – Energy Safety should clearly define "Critical Facilities."[6] The current Data Guidelines do not offer clear guidance on this, leading to a situation where various utilities might use their own, potentially varying definitions. This lack of uniformity could render comparisons between utilities ineffective, as each utility might categorize facilities as "critical" based on different criteria.[7]
- Tables 7 – 9 (Sections 4.3.7 – 9: Location of Utility Equipment Added or Upgraded) – Energy Safety should consider removing the "Area Type" and "WUI Status" columns from these tables to simplify data aggregation for each HFTD tier, as this information complicates the summarization. This data would be easier to analyze with fewer geographical subcategories within each HFTD tier. Stakeholders primarily focus on analyzing utility equipment at the HFTD tier level, rather than delving into the specific "Area Type" or "WUI" subcategories.

  Tables 2, 4, 7 – 9 (Sections 4.3.2 – 9) – Energy Safety should revise these tables by filling in all blank cells under the "Metric Type" and "Metric Number" columns to facilitate conversion of the table into a pivot table.[8, 9] Excel's analytical tools do not function with blank cells.

[5] Draft Data Tables, 2023, Tab "Table 5" at Cell D6.

[6] Draft Data Tables, Tab "Table 7" at Rows 82 - 99.

[7] *Decision Adopting De-Energization (Public Safety Power Shut-Off) Guidelines (Phase 1 Guidelines)* issued June 4, 2019. (D.19-05-042) at A4 to A5. This decision defines "Critical Facilities" for PSPS notification and data collection, but may differ from IOU's WMP definitions. The decision aligns with the Department of Homeland Security's list (Critical Infrastructure Sectors | CISA).

[8] Draft Data Tables, Tabs "Table 2, 4, 7 – 9" at Columns C and D.

[9] Pivot tables are important for analyzing tabular data. They provide a dynamic and organized way to summarize, filter, and gain insights from large datasets. Most importantly, they allow users to quickly rearrange and visualize data, making it easier to identify patterns, trends, and relationships within the information, which can be essential for data-driven insights.

- Table 13 (Section 4.3.13: Asset Work Orders) – Energy Safety should add the following columns to Table 13 to facilitate a more thorough assessment of progress in addressing each utility's past due asset work order backlog:
  - Overdue (Y/N)[10]
  - GO95 Exception Granted (Y/N)
  - Circuit ID#
  - Latitude in decimal degrees
  - Ignition Risk (Y/N)
  - Circuit Name
  - Segment ID #
  - Longitude in decimal degrees
- Table 13 (Section 4.3.13: Asset Work Orders) – As an alternative to providing latitude and longitude coordinates, Energy Safety should consider converting Table 13 to be part of the spatial data submission requirements (i.e. as a feature class rather than as a spreadsheet).[11] This approach would be more consistent with the data standard generally and would minimize projection errors.
- Table 14 (Section 4.3.14: HFTD Areas Risk Summary) – Energy Safety should divide the first column into two separate columns titled "HFTD Area" and "Line type" (e.g. distribution or transmission). Separate columns for these two distinct concepts will allow for enhanced analysis and clearer risk summaries in pivot tables.[12]
- Table 15 (Section 4.3.15: Top Risk Scores) – Energy Safety should revise the table by adding four columns:
  - Circuit Name,
  - Risk model version number or date,
  - Included in the scope of current mitigation measures (Y/N), and
  - Description of how risk score is aggregated to the level reported.
- Table 15 (Section 4.3.15: Top Risk Scores) – Energy Safety should clearly define the units being reported for likelihood and consequence. For example, a utility could present consequence in units of money or acreage, or arbitrary units. This will enable a more accurate and comprehensive evaluation across the different utilities.

In conclusion, the changes proposed here to the non-spatial data tables and the broader data reporting framework will make utility maintenance data more accurate and actionable.

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[10] Work orders that are either overdue or due within the quarter just completed.

[11] Draft Data Guidelines v 3.2, Section 3.6 GIS Data Schema at 16 - 148.

[12] Draft Data Tables, Tab "Table 14" at Column A.

Cal Advocates' proposed changes also enhance standardization of utility reporting in certain areas to ensure consistency and comparability across different utilities.

B. Energy Safety should revise Table 13 to narrow its focus on overdue asset work orders (Section 4.3.13 Table 13).

Currently, Table 13 includes all open asset work tags, an approach that has the potential to generate an overwhelmingly large and complex dataset. For example, Southern California Edison's open asset work orders total almost 900,000 tags.[13] Much of this data consists of tags that are not urgent, as they might not be due for several years.[14] This large data set obscures more urgent asset management problems and impedes Energy Safety's and other stakeholders' timely and accurate assessment of a utility's operational safety.

To improve upon this, Energy Safety should limit Table 13 to work orders that are either currently overdue or due within the upcoming quarter. This proposed revision will achieve two important objectives. First, it streamlines the data, making it more manageable and relevant for analysis. Second, and perhaps more importantly, it directs attention to the most pressing issue: the backlog of overdue work orders. Cal Advocates made similar recommendations in 2022, highlighting the need for improvements to Table 13.[15]

C. Energy Safety should require utilities to provide full model outputs in addition to Table 15 (Section 4.3.15 Table 15).

Currently, the Data Guidelines require utilities to, in Table 15, report the calculated value of each risk component for circuits, segments, or spans that "significantly contribute to risk."[16] However, this is not a complete data set for risk analysis. In developing comments on the 2023-2025 Base WMPs and subsequent revisions, Cal Advocates made extensive use of the full output of the utilities' risk models, which we obtained through discovery. Energy Safety should revise the Data Guidelines to call for the full outputs of risk models, instead of limiting the available

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[13] Southern California Edison's (SCE) Quarterly Data Report (QDR) for the third quarter of 2023, Table 13.

[14] SCE's QDR for the third quarter of 2023, Table 13.

[15] Cal Advocates, *Public Advocates Office Comments on Draft Data Guidelines*, November 28, 2022 at 3-4.

[16] Draft Data Guidelines at 169.

data only to the segments that "significantly contribute to risk."[17] The current language of the Data Guidelines would omit nearly 95 percent of the data that Cal Advocates used in our risk analyses.

Furthermore, it is possible that a utility's risk evaluation does not neatly conform to the structure set for Table 15. This may result in key risk information being aggregated or omitted to fit the requested data structure.

Thorough and accurate analyses of risk model outputs are important to evaluating each utility's strategy to reduce wildfire risk. To remediate the concerns described above, Energy Safety should update the Data Guidelines to require utilities to include full model outputs as an attachment to their 2025 WMP Updates. This attachment should be filed in addition to Table 15 and should include, at a minimum, a tabulated list of all modeled units[18] and their associated risk scores. If a utility's model generates multiple risk scores (such as asset failure risk and vegetation strike risk), all such scores should be included. It may also be useful to request similar data in a GIS-readable format.

For comparison, utilities should also file the full output of their baseline risk models (e.g., the models used in their 2023-2025 Base WMP filings) in a comparable format. Similar recommendations were made last year by Cal Advocates, highlighting the need for comprehensive reporting of utility risk model outputs.[19]

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[17] Draft Data Guidelines at 169. A "significant contribution to risk" 1) individually contributes more than 1 percent of the total overall utility risk; or 2) is in the top 5 percent of highest risk circuits/segments/spans when all circuits/segments/spans are ranked individually from highest to lowest risk.

[18] This may be circuits, circuit segments, spans, or some other measure that represents the most granular level at which the utility aggregates and utilizes risk scores.

[19] Cal Advocates, *Comments of the Public Advocates Office on Public Advocates Office Comments Guidelines for the 2025 Wildfire Mitigation Plan Updates*, August 18, 2023 at 6-8.

III. CONCLUSION

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed in these comments.

Respectfully submitted,

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