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## **Docket# Data Guidelines**

January 16, 2024

Stephen P. Lai  
Research Data Manager, Data Analytics Division  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**SUBJECT: Southern California Edison Company's Opening Comments on Draft Data Guidelines Version 3.2**

Dear Research Data Manager Lai:

Southern California Edison Company (SCE) appreciates the revisions made by the Office of Energy Infrastructure Safety (Energy Safety) to its Geographic Information Systems Data Standard Guidelines (GIS Data) and Wildfire Mitigation Data (Non-Spatial Data Tables) and the opportunity to provide comments. SCE provides the following comments regarding the draft Data Guidelines.

**A COMPREHENSIVE ANALYSIS OF ALL CHANGES ASSOCIATED WITH DRAFT DATA GUIDELINES VERSION 3.2 CANNOT BE COMPLETED DUE TO SEVERAL MISSING ELEMENTS ASSOCIATED WITH THE QDR SUBMISSION**

Though Energy Safety distributed version 3.2 change logs for both the GIS Spatial QDR and the Non-Spatial Tables 1-15 on Dec. 15, 2023, SCE has not yet received the accompanying Geo-Database (GDB) template, the GIS QDR Spatial Data Status Report template or the OEIS-QDR-GIS-Data-Schema-Domain-Values Excel file. Without these supplemental files, SCE is unable to complete a complete variance analysis to catalog all changes between Data Guidelines version 3.1 and draft Data Guidelines version 3.2 or to incorporate these changes into our WiSDM Foundry system for QDR reporting.

**HISTORICAL COLUMNS SHOULD NOT BE REMOVED FROM NON-SPATIAL TABLES 1-15**

Energy Safety's proposed removal of columns for previously reported actuals from various tables in the Non-Spatial Tables 1-15 presents a unique challenge as to how utilities will be able to true-up or make corrections to previous quarter actuals if these columns are removed. The inability to revise previous quarterly data would increase potential misalignment between data found in the Non-Spatial Tables and other external reports such as the Quarterly Notification Letter (QNL) where year-to-date data is reported.

**THE QDR SPATIAL DATA VERSION 3.2 CHANGE LOG ENTRY FOR HIGH WIND WARNING DAY POLYGON IS BLANK**

The change log does not provide which Field Name or Change was performed for the High Wind Warning Day Polygon. SCE seeks clarification as to what change, if any, was intended.

**DATE VS DATE TIME FIELDS IN GIS SPATIAL QDR**

SCE would like to request alignment between all DateTime fields in the version 3.2 draft Data Guidelines and the corresponding field types in the OEIS-QDR-GIS-Data-Schema-Domain-Values Excel file. In the previous version of this file, the DateTime fields contained a Date only field type, which results in a validation error in our WiSDM Foundry system.

**SCE LOOKS FORWARD TO ENERGY SAFETY ADDRESSING THE QUESTIONS POSED AT THE DATA GUIDELINES WORKSHOP**

During the Workshop on the draft Data Guidelines, SCE and other stakeholders submitted several questions seeking clarifications on the draft Data Guidelines. These included questions seeking clarification on the new audits feature class, resubmission of previous quarterly reports when new data and/or errors are identified, domain value restrictions, and other subject areas. These questions remain open. SCE would appreciate responses to the clarifying questions raised during the Workshop before Energy Safety finalizes the Data Guidelines.

**CONCLUSION**

SCE appreciates the opportunity to provide comments on the draft Data Guidelines Version 3.2 and looks forward to continuing to work with the Office of Energy Infrastructure Safety and other stakeholders on this matter. If you have questions or require additional information, please contact me at [gary.chen@sce.com](mailto:gary.chen@sce.com).

Sincerely,

//s//

Gary Chen

Director, Safety & Infrastructure Policy