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January 19, 2024

Jessica Block  
Chair  
California Wildfire Safety Advisory Board  
715 P Street, 20th Floor  
Sacramento, CA 95814

**SUBJECT:** Southern California Edison Company's Comments on Draft California Wildfire Safety Advisory Board Policy Papers

Dear California Wildfire Safety Advisory Board Staff:

Southern California Edison Company (SCE) respectfully submits these comments regarding two draft California Wildfire Safety Advisory Board (WSAB) Policy Papers containing recommendations for certain updates to existing electric utility regulations (Policy Papers).<sup>1</sup> On December 1, 2023, WSAB provided notice of the draft Policy Papers and invited stakeholders to submit written comments on the proposals contained within them.

#### **GENERAL COMMENTS**

SCE recognizes the dynamic threat that climate change poses in California and the potential exacerbation of wildfire risk in the long term. We acknowledge that modifications to Commission regulations may be necessary to further address future wildfire risk.

SCE appreciates the Office of Energy Infrastructure Safety's (Energy Safety's) efforts to date to obtain input from SCE, the public, and other stakeholders in the development of recommendations to address wildfire risk. SCE viewed the Energy Safety public workshop<sup>2</sup> as a valuable first step in evaluating potential modifications to existing regulations to help focus future efforts.

SCE welcomes WSAB's input in the evaluation of future rules and continues to urge close collaboration with Investor Owned Utilities and other subject matter experts to help policymakers

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<sup>1</sup> These comments address the Draft Policy Paper on Updating Utility Regulations in Light of Climate Change and Wildfire Risks, and the Draft Policy Paper on Updating Vegetation Management Regulations and Industry Practices.

<sup>2</sup> Safety Requirements to Address Increasing Wildfire Risk from Climate Change and Aging Infrastructure held on July 13, 2023 and July 14, 2023.

fully understand operational realities and concerns. Because California Public Utilities Commission (CPUC) General Orders (GO) 95 and 128 dictate the minimum requirements for constructing, operating and maintaining electric and communication systems, modifications to General Order rules require substantive review and diligence similar to their original development. The rules and regulations contained within the current General Orders “embody the results of extensive investigations and mature study...in which all branches of the electric industry have taken part...and reflect long years of experience gained in the construction, operation and maintenance of overhead electric lines of all types.”<sup>3</sup> Likewise here, utility stakeholders should have an adequate opportunity to carefully review and evaluate any proposed changes to these General Orders and provide feedback on the potential consequences of any proposed modifications.

Below, SCE provides comments on a selection of WSAB recommendations to provide examples of the types of considerations and concerns that WSAB’s proposals raise. In the interest of brevity, SCE has not attempted to comment on each of the recommendations provided in the Policy Papers. Thus, the fact that SCE has not commented on a particular recommendation should not be construed as SCE’s agreement or disagreement with that recommendation.

### **COMMENTS ON SELECTED RECOMMENDATIONS**

WSAB recommends regulatory changes to GO 95 Rule 35 to “include guidance on the frequency of visual and intrusive inspections in the HFTD of trees within strike distance of the powerlines.”<sup>4</sup> WSAB states that this “guidance should address 360-degree ground and aerial inspections, and intrusive core and root sampling as part of an assessment by a certified arborist. Such revisions should also address the inspections of trees within strike distance following heavy winter storms and drought years.”<sup>5</sup> SCE finds this recommendation concerning to the extent it requires the deployment of specialized ground (human) crews and precludes or restricts the use of remote sensing technologies. In the coming years, SCE anticipates increased use of remote sensing technology as a supplement or replacement for traditional ground inspections, both for routine and hazard tree inspections. In addition, requiring full hazard tree inspections after storms or droughts would have significant implications for costs, resources, and feasibility, and may be unnecessary in many cases. Specialized core and root sampling by certified arborists would also impose a heavy burden, as only a handful of qualified individuals in California have enough expertise to perform such sampling correctly.

WSAB further recommends updating GO 95 Rule 35 to “provide guidance to the electrical corporations on the appropriate maximum limit for pruning of healthy branches for trees and when it is prudent instead to remove the tree regardless of its health.”<sup>6</sup> WSAB states that such guidance “should consider different species and regional factors such as soil, climate, and

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<sup>3</sup> See January 2020 GO 95, Preface, p. x, available at [docs.cpuc.ca.gov/PublishedDocs/Published/G000/M338/K730/338730245.pdf](https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M338/K730/338730245.pdf)

<sup>4</sup> See Draft Policy Paper on Updating Vegetation Management Regulations and Industry Practices, page 6.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* at 7.

topography.”<sup>7</sup> The guidance that WSAB recommends be included in Rule 35 would be very difficult to interpret. Arboriculturally, every single tree can be unique and it may be difficult to reach consensus on a maximum pruning distance or “one size fits all” requirement for each species across the state. Furthermore, such guidance may be unnecessary and potentially redundant, given existing standards for vegetation management. For example, ANSI A300 standards already state that not more than 25% of the canopy should be pruned and that adjustments should be made for a plant’s species, age, health, and site; and include certain exemptions for utilities.<sup>8</sup>

## **CONCLUSION**

SCE welcomes the opportunity to further engage with the CPUC, Energy Safety, the electrical corporations, and other stakeholders to further evaluate and refine relevant proposals. Such a process can generate collaborative proposals that ensure wildfire risk reduction through science-based, benchmarked solutions. The rules and regulations in the General Orders serve as the minimum requirements for how utilities should construct, operate and maintain the grid. New requirements often introduce costs to implement, as well as ongoing operations and maintenance costs to sustain, and potentially hamper more optimal strategies or solutions by providing excessive guidelines without full consideration of all practical scenarios.

SCE appreciates the opportunity to comment on the Draft Policy Papers. 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

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<sup>7</sup> *Id.*