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Caroline Thomas Jacobs
Director, Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Joint Utilities Comments on Revisions to 2023-2025 Maturity Model, Maturity Survey, and Process Guidelines

Dear Director Thomas Jacobs:

San Diego Gas & Electric Company, Southern California Edison Company, and Pacific Gas & Electric Company (the "Joint Utilities") hereby provide comments addressing the Draft Revisions to Wildfire Mitigation Plan ("WMP") Documents Related to the 2025 WMP Update ("Draft Revisions") issued by the Office of Energy Infrastructure Safety ("Energy Safety") on December 22, 2023. In preparation for the 2025 WMP Update submissions, Energy Safety is revising the 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model (Maturity Model), 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey (Maturity Survey), and 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (Process Guidelines).

I. The Joint Utilities Seek Additional Clarity Regarding the Process for Amending Maturity Survey Responses

Energy Safety provides guidance regarding when an electrical corporation seeks to amend its Maturity Survey responses on page 3 of the 2023-2025 WMP Process and Evaluation Guidelines. The guidance states the following, '*An electrical corporation must request permission through written request to the Deputy Director prior to filing any amendments to its survey responses.*' The Joint Utilities interpret this guidance to apply to future instances when an electrical corporation seeks to amend any previously submitted Maturity Survey responses, in which case permission through written request must be made per the guidance. The Joint Utilities request that the guidelines be clarified to make clear that this guidance does not apply to revising Maturity Survey responses during annual updates.

II. Recommended Improvements to the Maturity Survey Submission Process

Energy Safety's submission process for the Maturity Survey in 2023-2025 included a radio button entry approach for each of 1,156 survey questions (multiplied by four covering 2023-2026). This submission process proved to be arduous, laborious, and highly susceptible to human error. To minimize human error, optimize the process of submission, and reduce the potential burden of making corrections through the request process addressed above, the Joint Utilities suggest that Energy Safety consider utilizing a comma-separated value (.csv) or similar file type submission approach in lieu of the radio button entry approach previously used.

III. Future Maturity Model Surveys Should Reflect Enhancements to Address the Ongoing Challenges in Previously Identified Questions

There are several challenges that the Joint Utilities face with the current Maturity Model & Survey. A detailed discussion of these challenges can be found in the question-by-question comments submitted by each Joint Utility with last year's responses. Some of the problematic themes include the following:

1. Scoring maturity based on a minimum scoring methodology rather than an average score.
2. Questions that are outside utility responsibility, knowledge, or control.
3. Problematic questions that do not fully consider affordability or feasibility concerns, are overly vague, require IOU interpretation, and/or present capabilities without apparent value.
4. Questions that reference Energy Safety requirements that are not clearly defined.
5. Questions that are based on incorrect scientific / technical assumptions.

The Joint Utilities request that Energy Safety consider addressing these challenges in collaboration with the electrical corporations by revising the Maturity Model & Survey to improve its quality and effectiveness.

IV. The Default Deadline for Data Requests Should Be Extended to Five Days to Promote Efficiency

The Joint Utilities urge Energy Safety to revise the default deadline for responding to all WMP-related data requests from three business days to five business days. This three-day requirement appears in Section 7 of the Draft Guidelines, Data Requests from Energy Safety,¹ as well as in Section 8.2, Data Request Process for Data Request

¹ Draft Guidelines at 14 ("Unless a different response period is provided by Energy Safety, an electrical corporation must respond to all data requests by 5:00 p.m. on Day 3, with each business day counted as one day.")

Stakeholders.² Changing the default deadline from three business days to five business days will continue to allow for an expedited discovery process, reduce the substantial administrative burden on the utilities, require less meet and confer efforts among the parties, and potentially improve the quality of the data request responses as the utilities will have more time to perform quality control on responses before they are finalized.

As a point of comparison, the default response time for data requests on CPUC matters is 10 business days, which is twice as long as the period being suggested by the Joint Utilities.³ The Joint Utilities' remain committed to providing WMP-related discovery in an expedited manner to facilitate the three month WMP review period,⁴ but a modest extension of the data request response time will promote more efficiencies while still facilitating an expedited WMP review. Furthermore, even with an increase of the default response time to five business days, there would be nothing preventing requestors from seeking a response sooner than five business days if there was a need to further expedite the information.

As an example, for its 2023-2025 WMP, PG&E received 75 sets of data requests containing 501 distinct requests and 1,487 separate sub-requests. Responding to these 1,487 sub-requests posed an enormous administrative burden on the company that required PG&E to request 56 extensions to the three-business day deadline. By slightly increasing the default response time for data requests, this burden could be significantly eased and the need to meet and confer on extensions reduced. Given that the data would still be provided on an accelerated timeframe and that this would allow more time to quality check the responses being produced, this is a potential change that would benefit all parties involved in the WMP process.

V. Conclusion

The Joint Utilities request that Energy Safety take these recommendations into account in the final revisions to the 2023-2025 Maturity Model, Maturity Survey, and Process Guidelines.

Respectfully submitted,
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² Draft Guidelines at 17 (“An electrical corporation must respond to all data requests within three business days of the request (as described in Section 7), unless a different response period is mutually agreed upon by the stakeholder making the data request and the electrical corporation.”)

³ See [CPUC General Discovery Custom and Practice](#) (Nov. 20, 2019) at 1 (“The customary response time for data requests is 10 business days.”).

⁴ Pub. Util. Code §8386.3(a).