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Docket# 2021-ARC

April 17, 2024

Patrick Doherty, Program Manager
Office of Energy Infrastructure Safety
Compliance Assurance Division Electrical Infrastructure Directorate
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Comments on its 2021 Annual Report on Compliance

Dear Mr. Doherty:

Southern California Edison Company (SCE) respectfully submits these comments to the Draft Annual Report on Compliance (ARC) for SCE's 2021 Wildfire Mitigation Plan (WMP) issued by the Office of Energy Infrastructure Safety (Energy Safety) on April 3, 2024.¹

INTRODUCTION

SCE appreciates the opportunity to provide these opening comments on the ARC, which reflects Energy Safety's evaluation of SCE's compliance with its 2021 WMP. SCE also appreciates Energy Safety's finding that "While SCE did not meet all targets for its WMP initiatives, the failure to meet certain targets did not materially hinder SCE's ability to mitigate its wildfire risk...Energy Safety acknowledges that SCE undertook significant efforts to reduce its wildfire risk, and in many instances, SCE achieved its objectives and targets. On balance, SCE was largely successful in executing an actionable and adaptive plan for wildfire risk mitigation."² SCE's comments are focused on the ARC's references to outcome metrics. While outcome metrics provide valuable learnings to shape successive WMPs, they are not appropriate to assess a utility's compliance with its WMP, which has been reviewed by stakeholders and approved and ratified by Energy Safety and the California Public Utilities Commission (CPUC).

¹ Pursuant to Public Utilities Code § 8386.3(c)(4), Energy Safety "shall complete its compliance review within 18 months after the submission of the electrical corporation's compliance report." For future WMP compliance reviews, to the extent that Energy Safety completes its compliance report in advance of the 18-month statutory deadline, SCE would welcome the opportunity to review the report when complete so that SCE may timely incorporate Energy Safety's findings into future wildfire mitigation planning.

² ARC, p. 1.

COMMENTS ON DRAFT ANNUAL REPORT ON COMPLIANCE

The Retrospective Use of Outcome Metrics to Assess WMP Compliance Should Be Distinguished from the Prospective Use of Such Metrics to Assess WMP Effectiveness

Consistent with its previous comments on the use of outcome metrics, SCE continues to have fundamental concerns that outcome-based metrics—designed to measure the effectiveness of a given WMP—may be used retrospectively to evaluate compliance with an approved WMP. Through an extensive process including collaboration with Energy Safety and input from multiple stakeholders, SCE has developed comprehensive WMPs which have ultimately been approved by Energy Safety and ratified by the Commission in prior years. However, the question of whether SCE subsequently complies with its WMP is distinct from the question of how “occurrence of events that correlate to wildfire risk” may inform future WMP development and evaluation.

The WMP process is based on the notion that electrical corporations must develop a WMP, obtain approval of the WMP as an appropriate means to proactively reduce wildfire risk based on known information at the time, and then to implement that WMP. Adding an evaluation of outcome metrics effectively creates a hindsight standard and undermines the value and meaning of the WMP as an agreed upon plan and basis for wildfire mitigation.

Outcome metrics should not be used as a vehicle to view in hindsight initiatives that have already been vetted and approved, and upon which SCE and other utilities rely to understand their compliance obligations. Although certain metrics in one year may be helpful in assessing WMP effectiveness and informing WMP mitigation programs for subsequent years, they are not indicative as to whether or not a utility executed the tasks in, and complied with, its approved WMP. In particular, such metrics are dependent on a number of exogenous factors such as weather conditions and fuel moisture, which are outside of a utility’s control, and which can make shorter-term comparisons of outcome metrics challenging. Moreover, evaluating the outcome metrics from the same year that the WMP work is being completed (2021 in this case), makes the comparison even less meaningful.

Once Energy Safety has approved a WMP after having considered input from stakeholders and the WMP has been ratified by the Commission, the compliance assessment should focus on whether the utility has substantially implemented the approved plan initiatives and not consider outcomes—many of which may be beyond a utility’s control—to judge a utility’s compliance.

CONCLUSION

SCE appreciate the opportunity to provide these comments.

If you have any questions, or require additional information, please contact me at gary.chen@sce.com.

Sincerely,

//s//

Gary Chen

Director, Safety & Infrastructure Policy