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**Via Electronic Filing**

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**Subject: Errata to the Comments of the Public Advocates Office on the Draft Decision Approving Southern California Edison's 2025 Wildfire Mitigation Plan Update**

**Docket: 2023-2025-WMPs**

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following corrections on p. 2, FN 8 and 11; p. 4, FN 19; p. 5, FN 22 and 23; p. 6, FN 25 to the comments on the Draft Decision Approving Southern California Edison Company's 2025 Wildfire Mitigation Plan Update.

Please contact Nathaniel Skinner ([Nathaniel.Skinner@cpuc.ca.gov](mailto:Nathaniel.Skinner@cpuc.ca.gov)) or Henry Burton ([Henry.Burton@cpuc.ca.gov](mailto: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.

Sincerely,

/s/ **Marybelle C. Ang**

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## I. INTRODUCTION

On April 2, 2024, Southern California Edison Company (SCE) filed its *2025 Wildfire Mitigation Plan Update* (2025 WMP Update).<sup>1-2</sup> On May 7, 2024, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) and other stakeholders filed formal comments on the 2025 WMP Update of SCE.<sup>3</sup>

On August 22, 2024, the Office of Energy Infrastructure Safety (Energy Safety) issued its *Draft Decision on 2025 Wildfire Mitigation Plan Update of Southern California Edison Company* (Draft Decision).<sup>4</sup> The cover letter of the Draft Decision invites interested persons to file opening comments by September 11, 2024 and reply comments by September 23, 2024.

Pursuant to the Energy Safety *Revised 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (WMP Process Guidelines),<sup>5</sup> the *Revised 2025 Wildfire Mitigation Plan Update Schedule*,<sup>6</sup> (Revised WMP Update Schedule), and the cover letter of the Draft Decision, Cal Advocates submits these comments on the Draft Decision. In these comments, Cal Advocates makes the following principal recommendations:

- Energy Safety should require SCE to provide additional detail that demonstrates the effectiveness of interim mitigations during grid hardening delays.
- Energy Safety should require a more forward-looking approach when setting grid hardening targets.

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<sup>1</sup> SCE, 2025 Wildfire Mitigation Plan Update, April 2, 2024 (SCE 2025 WMP Update).

<sup>2</sup> Many of the Public Utilities Code requirements pertinent to wildfires apply to “electrical corporations.” See e.g., Public Utilities Code Section 8386. These comments use the more common term “utilities” and the phrase “electrical corporations” interchangeably to refer to the entities that must comply with the wildfire safety provisions of the Public Utilities Code.

<sup>3</sup> *Comments of the Public Advocates Office on the 2025 Wildfire Mitigation Plan of the Southern California Edison Company*, May 7, 2024, in Docket 2023-2025-WMPs (Cal Advocates Comments on 2025 WMP Update).

<sup>4</sup> Energy Safety, *Draft Decision on 2025 Wildfire Mitigation Plan Update of Southern California Edison*, August 22, 2024, in Docket 2023-2025-WMPs (Draft Decision).

<sup>5</sup> Office of Energy Infrastructure Safety’s (Energy Safety), *Revised 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, January 31, 2024, in docket 2023-2025-WMPs. See also, Energy Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022.

<sup>6</sup> Energy Safety, *Revised 2025 Wildfire Mitigation Plan Update Schedule*, February 22, 2024, in docket 2023-2025-WMPs.

- Energy Safety should require SCE to improve work order prioritization and accountability.

## II. GRID HARDENING

### A. Energy Safety should require that SCE demonstrate the effectiveness of interim mitigations during grid hardening delays.

While Energy Safety’s Draft Decision recognizes the importance of addressing interim risk mitigations, it stops short of requiring SCE to provide comprehensive contingency plans that account for potential delays in grid hardening projects.<sup>7</sup> Without such plans, Severe Risk Areas (SRAs) may not receive the immediate attention they require, particularly if grid hardening projects face project delays.

SCE’s 2025 WMP Update emphasizes undergrounding as the long-term solution for mitigating wildfire risks in SRAs.<sup>8</sup> This strategy is based on the assertion that undergrounding can provide durable and reliable protection against ignitions over a projected timeline of 45 years or more.<sup>9</sup> However, reliance on undergrounding introduces challenges and trade-offs, particularly in SRAs, where terrain complexity and permitting obstacles can lead to extended project timelines, during which these vulnerable areas remain exposed. SCE asserts that while its primary focus is on long-term risk reduction, interim measures such as more frequent inspections and enhanced vegetation management are sufficient to manage risks in the meantime.<sup>10</sup>

However, SCE’s 2025 WMP Update lacks detailed documentation regarding how these interim measures will be monitored, adjusted, and enforced based on real-time conditions. In addition, SCE’s recent performance in grid hardening projects has been inconsistent, as some programs have experienced significant delays.<sup>11</sup> These delays raise concerns about the safety

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<sup>7</sup> Office of Energy Infrastructure Safety (Energy Safety), *Draft Decision on SCE 2025 Wildfire Mitigation Plan Update* (Draft Decision) at 24, August 22, 2024.

<sup>8</sup> Southern California Edison (SCE), 2025 Wildfire Mitigation Plan Update, April 2, 2024 (2025 WMP Update) at [7536](#).

<sup>9</sup> SCE 2025 WMP Update at 60.

<sup>10</sup> SCE 2025 WMP Update at 60.

<sup>11</sup> SCE 2024 Quarterly Data Report (QDR), 2<sup>nd</sup> quarter, “SCE\_2024\_Q2\_Tables115\_R0”, Table [21](#), August 2, 2024. The Covered Conductor program has installed only 305 of 950 miles (about one-third) of the 2024 target. The Targeted Underground program has yet to install any of its 16-mile goal. REFCL projects are “at risk of not meeting [year-end] targets.”

measures in place during the interim period. The Draft Decision does not identify the metrics and criteria that SCE should meet to demonstrate the efficacy of its interim actions.<sup>12</sup> The absence of metrics could result in diminished oversight and an elevated risk of wildfires. Energy Safety should require detailed evidence of the effectiveness of SCE's interim mitigations. It is essential that Energy Safety revise the Draft Decision to include clear, measurable metrics and criteria that SCE must adhere to.

Though the intent to manage interim risks during hardening delays is commendable,<sup>13</sup> the Draft Decision overlooks key areas. Energy Safety should strengthen the oversight process to ensure that SCE's interim actions are both effective and transparent. The following recommendations focus on establishing measurable metrics and criteria and ensuring that interim mitigations are adequate:

- Energy Safety should require SCE to develop more robust contingency plans that emphasize the need for continuous monitoring and data-driven adjustments to interim measures, ensuring they remain effective throughout any delays in undergrounding projects. Such measures will help mitigate the interim risk of ignitions in SRA while awaiting the completion of undergrounding projects.
- Energy Safety should revise its Draft Decision to include clear and measurable metrics by which the efficacy of SCE's interim actions should be evaluated. By specifying these metrics and criteria, Energy Safety can ensure more effective oversight, reduce the potential for increased wildfire risks, and hold SCE accountable for maintaining safety during grid hardening delays.

Incorporating these recommendations into the final decision will improve the effectiveness of SCE's wildfire mitigation efforts and Energy Safety's oversight of SCE's efforts. By doing so, Energy Safety will ensure that SCE's approach to interim risk mitigations adequately addresses the immediate risks during the prolonged period before undergrounding projects are complete.

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<sup>12</sup> Draft Decision at 24.

<sup>13</sup> Draft Decision at 24:

SCE stated that it employs a suite of interim wildfire mitigation activities to identify and remediate risks while the undergrounding is being planned, designed, and constructed. SCE stated that the suite of interim wildfire mitigation activities includes more frequent inspections, more frequent vegetation management treatments, and use of fast curve settings, often paired with fast-acting current limiting fuses.

**B. Energy Safety should require a more forward-looking approach to setting grid hardening targets.**

Energy Safety’s Draft Decision acknowledges SCE’s adjustments to its 2025 targets for covered conductor installation, undergrounding, and Rapid Earth Fault Current Limiter (REFCL) Ground Fault Neutralizer (GFN) initiatives.<sup>14</sup> The Draft Decision appears to accept these reductions based on SCE’s explanations.<sup>15</sup> However, the Draft Decision does not adequately address the potential long-term implications for wildfire risk management. Energy Safety’s Draft Decision correctly identifies the procedural oversight,<sup>16</sup> but it stops short of examining the strategic consequences of SCE reducing these targets.

SCE describes its decision to lower its 2025 targets as a prudent response, given it has exceeded previous goals.<sup>17</sup> However, this approach fails to account for the dynamic and increasingly severe nature of wildfire risks. Wildfire threats are not static; they evolve with changing climate conditions, land use patterns, and vegetation growth. By reducing its targets, SCE risks leaving critical areas vulnerable.

SCE initially requested 850 miles of covered conductor in 2025 as part of its test year 2025 general rate case.<sup>18</sup> The Draft Decision accepts SCE’s reduction in the covered conductor target from the initial 700 circuit miles in the WMP to 500 miles.<sup>19</sup> SCE justifies this reduction by citing its overperformance in 2022 and 2023,<sup>20</sup> as well as the limited remaining scope for deployment in the final years of the program.<sup>21</sup> The Draft Decision should scrutinize SCE’s assumption that past success reduces the current need for mitigation work.

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<sup>14</sup> Draft Decision at 25.

<sup>15</sup> Draft Decision at 27.

<sup>16</sup> Draft Decision at 27.

<sup>17</sup> Draft Decision at 26.

<sup>18</sup> A.23-05-010, *Amended Wildfire Management Part 2: Grid Hardening*, 2025 General Rate Case at 55, November 20, 2023. “The proposed pace of work for WCCP [Wildfire Covered Conductor Program] would be 850, 300, 50, 50 miles for 2025, 2026, 2027, 2028, respectively.”

<sup>19</sup> Draft Decision at ~~26~~25.

<sup>20</sup> Draft Decision at 25.

<sup>21</sup> Draft Decision at 25.

Likewise, the Draft Decision does not adequately analyze SCE’s justifications for reducing its undergrounding and Rapid Earth Fault Current Limiter (REFCL) program targets.<sup>22</sup> Although SCE cites delays in permitting, environmental reviews, and supply chain constraints as reasons for these reductions,<sup>23</sup> Energy Safety should require SCE to develop more robust contingency plans. Simply lowering targets in response to implementation challenges does not address the underlying wildfire risks.

Energy Safety’s final decision should emphasize the need for greater transparency and accountability in SCE’s planning process. Reductions in program targets should not be made without thorough analysis of the implications for wildfire risk. The following recommendations will ensure that SCE’s adjustments to its grid hardening targets reflect a comprehensive understanding of both current and future risks:

- Energy Safety should require SCE to adopt a forward-looking approach to target-setting that goes beyond merely reflecting past performance. SCE should incorporate modeling and scenario planning to anticipate future wildfire risks and ensure that grid hardening efforts are robust enough to meet these challenges.
- Energy Safety should require that SCE provide a comprehensive justification for any reductions in grid hardening targets, including detailed risk assessments that demonstrate how these reductions will not compromise the long-term safety and resilience of the grid.
- Energy Safety should revise its Draft Decision to direct SCE to develop adaptive planning mechanisms in its grid hardening strategy. This would involve setting flexible targets that can be adjusted in response to changing conditions and emerging risks.

In summary, while SCE’s adjustments to its 2025 targets might be based on past performance and immediate challenges, it is crucial that these decisions are made with a forward-looking, adaptive approach that fully considers the evolving nature of wildfire risks. Energy Safety’s final decision should ensure that SCE’s strategies are not only reactive but also proactive.

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<sup>22</sup> Draft Decision at [25 - 26](#).

<sup>23</sup> Draft Decision at [25 - 26](#).

### III. ASSET MANAGEMENT

#### A. Energy Safety should require SCE to improve asset work order prioritization and management.

Effective management of asset work orders is fundamental for wildfire risk mitigation. It directly influences how quickly and efficiently SCE addresses wildfire hazards, while it ensures that infrastructure maintenance adheres to required standards. Energy Safety should amend its Draft Decision to ensure SCE prioritizes and effectively manages asset work orders.

The backlog of asset work orders is one of the most pressing issues identified in SCE's 2025 WMP Update.<sup>24</sup> SCE's unresolved asset work orders can leave vulnerable equipment on the electrical grid exposed to conditions that may increase the likelihood of ignitions, especially in high wildfire risk areas.

Energy Safety's Draft Decision states that SCE has not provided adequate documentation on how it determines whether a notification poses an ignition risk.<sup>25</sup> Clarity in risk evaluation helps ensure that SCE's practices are aligned with the overarching goal of wildfire risk reduction. Without clear documentation of the criteria used to assess ignition risk, it is difficult to determine whether SCE is effectively prioritizing work orders based on the level of risk they pose.

Strengthening oversight and ensuring the effective management of asset work orders will mitigate wildfire risks. By prioritizing critical work orders and addressing backlogs promptly, SCE can reduce the likelihood of ignitions caused by infrastructure failures. This proactive approach will help protect vulnerable communities and reduce the overall risk of catastrophic wildfires.

In order to enhance wildfire prevention efforts, it is crucial that Energy Safety implement measures that promote transparency, thorough risk evaluation, and stakeholder engagement. By incorporating the following recommendations, Energy Safety can improve oversight and support the development of more effective wildfire mitigation strategies:

- Energy Safety should direct SCE to provide comprehensive documentation of the criteria it uses to determine ignition risk in all distribution and transmission asset notifications. This documentation should describe the specific factors considered in the risk assessment

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<sup>24</sup> SCE 2025 WMP Update at 72-76.

<sup>25</sup> Draft Decision at ~~35~~34.



process, such as the location of the equipment, historical weather patterns, vegetation management practices, and the condition of the infrastructure.

- Energy Safety should require that SCE’s risk evaluation procedures be made available to stakeholders and the public, to enhance transparency and external scrutiny.

These requirements will help protect communities from the devastating impacts of wildfires and ensure that SCE’s infrastructure adheres to the highest standards.

#### **IV. CONCLUSION**

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed herein.

Respectfully submitted,

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