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Via Electronic Filing

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
Sacramento, CA 95184
efiling@energysafety.ca.gov

Subject: Reply 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 reply 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) or Henry Burton (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***

Marybelle C. Ang
Attorney

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Telephone: (415) 696-7329
E-mail: Marybelle.Ang@cpuc.ca.gov

#541337168

The Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue, San Francisco, CA 94102-3298
www.publicadvocates.cpuc.ca.gov

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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).¹⁻² On May 7, 2024, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) and other intervenors filed formal comments on the 2025 WMP Update of SCE.³⁻⁴

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).⁵ 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),⁶ the *Revised 2025 Wildfire Mitigation Plan Update Schedule* (Revised WMP Update Schedule),⁷ and the cover letter of the Draft Decision, Cal Advocates submits these reply comments on the Draft Decision. In these comments, Cal Advocates makes the following principal recommendations:

- Energy Safety should explain how it incorporated intervenor input in evaluating SCE's 2025 WMP Update.
- Energy Safety should briefly describe each intervenor's recommendations and explain how it has addressed each issue.

¹ SCE, 2025 Wildfire Mitigation Plan Update, April 2, 2024 (SCE 2025 WMP Update).

² 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.

³ *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 SCE's 2025 WMP Update).

⁴ Cal Advocates uses the term “**intervenor**” to refer to organizations that are not utilities and that regularly participate in the WMP process. An equivalent term would be “**non-utility stakeholder**.”

⁵ Energy Safety, *Draft Decision on 2025 Wildfire Mitigation Plan Update of Southern California Edison*, August 22, 2024, in Docket 2023-2025-WMPs (Draft Decision).

⁶ Office of Energy Infrastructure Safety (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.

⁷ Energy Safety, *Revised 2025 Wildfire Mitigation Plan Update Schedule*, February 22, 2024, in docket 2023-2025-WMPs.

- Energy Safety should cite and reference intervenor contributions in the final decision.

II. INTERVENOR INPUT AND RECOMMENDATIONS

A. Energy Safety should explain how it incorporated intervenor input and recommendations in evaluating SCE's 2025 WMP Update.

In opening comments on Energy Safety's Draft Decision on SCE's 2025 WMP Update, Green Power Institute (GPI) and Mussey Grade Road Alliance (MGRA) note that the Draft Decision should better consider the analysis and recommendations provided by intervenors.⁸ Both GPI and MGRA voice concern that Energy Safety relies on SCE's statements without adequate acknowledgment of intervenors' contributions and concerns.⁹

1. The Draft Decision does not meet the level of analysis set by previous years' decisions.

MGRA states that Energy Safety has narrowed its scope of review compared to last year's review.¹⁰ Energy Safety's analysis in the Draft Decision relies heavily on information provided by SCE. The Draft Decision does not demonstrate how Energy Safety considers intervenor contributions. Key areas like grid hardening and risk modeling raised by intervenors are not reasonably discussed in the Draft Decision. As a result, Energy Safety may be missing needed improvements in the utility's wildfire risk mitigation strategies.

Concerns from last year's WMP decision are not addressed.¹¹ For example, MGRA identifies that SCE failed "to ensure that the Wildfire Mitigation Plan reviews were adequately staffed and resourced."¹² The Draft Decision contains no discussion of this recommendation. The Draft Decision does not reasonably address known issues and thereby falls short of the level of analysis that stakeholders have come to expect in WMP decisions.

⁸ See, e.g., *Comments of the Green Power Institute on the Draft Decision on SCE's 2025 Wildfire Mitigation Plan Update* (GPI Comments on SCE Draft Decision), September 11, 2024 at 5-6; *Mussey Grade Road Alliance Comments on the Office of Energy Safety Infrastructure Draft Decision on Southern California Edison Company 2025 Wildfire Mitigation Plan Update* (MGRA Comments on SCE Draft Decision), September 11, 2024 at 5-6.

⁹ See, e.g., GPI Comments on SCE Draft Decision at 5-6; MGRA Comments on SCE Draft Decision at 4-6.

¹⁰ MGRA Comments on SCE Draft Decision at 3.

¹¹ MGRA Comments on SCE Draft Decision at 3.

¹² MGRA Comments on SCE Draft Decision at 4.

2. Intervenor organizations have provided substantive analyses of SCE's 2025 WMP Update.

In 2024, five intervenor organizations provided comments on SCE's 2025 WMP Update.¹³ These comments totaled approximately 300 pages and covered a wide range of substantive issues.¹⁴ For instance, Cal Advocates provided comments on SCE's asset management, risk assessment methods, and system hardening targets. Cal Advocates' comments included 18 distinct, actionable recommendations related to SCE's 2025 WMP Update.¹⁵ Energy Safety acknowledged one of these recommendations.¹⁶

Other intervenors commented on SCE's grid studies and asset inspections. MGRA requested the inclusion of covered conductor field data in ongoing grid hardening studies. GPI urged SCE to address access issues impacting high fire risk-informed (HFRI)¹⁷ inspections and to report uninspected assets from 2022-2024.¹⁸

3. The Draft Decision does not evaluate intervenors' analyses and recommendations.

The Draft Decision would be improved by addressing intervenors' concerns. Intervenors bring vital subject matter expertise to WMP matters. Energy Safety should include and evaluate intervenors' comments as part of its WMP decisions to show that it has taken a considered and non-arbitrary approach, even if Energy Safety does not agree with the concern expressed by an intervenor. This type of feedback can help intervenors provide more useful information to Energy Safety going forward.

¹³ Comments were filed on May 7, 2024, by the Green Power Institute (GPI), the Mussey Grade Road Alliance (MGRA), the Rural County Representatives of California (RCRC), the California Department of Fish and Wildlife (CDFW), and the Public Advocates Office at the California Public Utilities Commission (Cal Advocates). See Energy Safety docket 2023-2025-WMPs.

¹⁴ Some of the comments addressed multiple electric utilities.

¹⁵ Cal Advocates Comments on SCE's 2025 WMP Update at 2-3: Table of Recommendations.

¹⁶ Cal Advocates commented on SCE's wildfire risk model, as a follow-up to the 2023 Area for Continued Improvement requiring probabilistic modeling instead of maximum consequence modeling. Cal Advocates Comments on SCE's 2025 WMP Update at 13-15.

¹⁷ SCE, 2023 - 2025 Wildfire Mitigation Plan, October 26, 2023 at 282:

HFRI programs seek to identify equipment or structure degradation that occurs between compliance cycles that could lead to a potential ignition risk, SCE conducts more frequent and ignition-focused risk inspections in HFRA beyond GO 165 requirements.

¹⁸ Draft Decision at A-12 to A-13: Appendix D.

The Draft Decision does not include the detailed analysis provided by intervenors. MGRA notes that, out of 196 citations in the Draft Decision, 189 (or 96%) refer to utility source material or previous decisions, rather than responses to data requests or intervenors’ analysis.¹⁹ The remaining seven citations in the Draft Decision refer to responses to Energy Safety’s data requests.²⁰ By contrast, the Draft Decision frequently references SCE’s assertions – for example, SCE’s claims regarding target changes in its covered conductor program.²¹

Table 1 below provides a partial list of the issues that Cal Advocates, MGRA and GPI alone raised numerous issues in initial WMP comments.²² Table 1 covers a few key categories of issues and does not include all intervenors.

Table 1: Issues Addressed in Intervenors’ Comments on SCE’s 2025 WMP Update			
	Cal Advocates	MGRA	GPI
Risk Assessment & Modeling	<ul style="list-style-type: none"> • Probabilistic risk modeling 	<ul style="list-style-type: none"> • Maximum consequence values • SCE’s IWMS framework • Covered conductor mitigation efficiency • Health effects of wildfire smoke 	<ul style="list-style-type: none"> • Model output sensitivity • Piloting/testing model updates • Probabilistic risk modeling • Reporting risk impact for compliance and strive targets • Risk model standardization
Grid Design, Operations, and Maintenance	<ul style="list-style-type: none"> • Quality of overhead inspections • Timeliness of asset work orders 	<ul style="list-style-type: none"> • Impact of Fast Curve settings 	<ul style="list-style-type: none"> • Inspections based on risk • Access issues affecting timeliness of transmission inspections
Vegetation Management			<ul style="list-style-type: none"> • Expanded clearances • Treatment and disposition of VM residues
Situational Awareness		<ul style="list-style-type: none"> • Early Fault Detection implementation 	
System Hardening	<ul style="list-style-type: none"> • Covered conductor target • REFCL target 	<ul style="list-style-type: none"> • Undergrounding project data • Hardening in Severe Risk Areas 	<ul style="list-style-type: none"> • System target and expenditure changes • Covered conductor scope of work • Undergrounding target • REFCL target

¹⁹ MGRA Comments on SCE Draft Decision 4.

²⁰ The cited data requests pertain to enhanced vegetation clearances, inspection find rates, and the cancellation of SCE’s conductor and splice assessment program.

²¹ Draft Decision at 25.

²² Comments filed on May 7, 2024, by the Green Power Institute (GPI), the Mussey Grade Road Alliance (MGRA), and the Public Advocates Office at the California Public Utilities Commission (Cal Advocates). See Energy Safety docket 2023-2025-WMPs.

Out of all the analysis provided by intervenors, the Draft Decision limits its discussion of issues raised by intervenors to only three issues: probabilistic risk modeling, evaluation of covered conductor effectiveness, and tracking the timeliness of transmission inspections.²³ The exclusion of intervenor input on other subjects is inexplicable since intervenors provide their input well before Energy Safety issues its analysis.²⁴

4. Energy Safety should consider the evidence revealed through intervenor discovery.

During the WMP review process, intervenors submitted numerous requests to SCE for data and information.²⁵ These questions and SCE's responses highlighted key concerns regarding SCE's 2025 WMP Update. However, the Draft Decision does not discuss the information revealed through intervenor data requests or the insights that intervenors provided based on those data requests.²⁶

5. Remedy: Energy Safety should explain how it considers intervenors' analysis and recommendations.

Energy Safety should discuss intervenors' recommendations and acknowledge intervenors who provide detailed analysis and thoughtful input. Cal Advocates recommends that Energy Safety take the following steps in each of its decisions on WMPs:

- Energy Safety should provide a review of intervenor input (both initial comments on the WMP and comments on the Draft Decision) and a summary response to each intervenor's recommendations.²⁷ This will show that Energy Safety has addressed all available evidence and will strengthen the thoroughness of Energy Safety's decisions.

²³ Draft Decision at A-12 to A-13: Appendix D. The Draft Decision cites three of the five intervenors that filed comments.

²⁴ Intervenors filed comments on SCE's 2025 WMP Update on May 7, 2024. Energy Safety issued the Draft Decision on August 22, 2024.

²⁵ For example, in 2024 as part of our review and analysis of SCE's 2025 WMP Update, Cal Advocates submitted 13 data requests to SCE, containing a total of 88 questions. Our analysis of SCE's 2025 WMP Update was also informed by the dozens of data requests we issued in 2023 regarding SCE's 2023-2025 comprehensive WMP.

²⁶ Draft Decision at A-11: Appendix C.

²⁷ The CPUC employs this practice in Resolutions and Decisions. See, e.g., Resolution SPD-15, March 8, 2024 at 15-19; Decision 23-11-069 on Test Year 223 General Rate Case for Pacific Gas and Electric Company, November 17, 2023 at 777-783.

- Energy Safety should cite and reference intervenor contributions. This will ensure that the decision is based on a comprehensive evaluation of all available evidence. It will also support continued intervenor engagement in the WMP review process.

III. CONCLUSION

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

Respectfully submitted,

/s/ *Marybelle C. Ang*

Marybelle C. Ang
Attorney

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Telephone: (415) 696-7329
E-mail: Marybelle.Ang@cpuc.ca.gov

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