



Gary Chen
Director, Safety & Infrastructure Policy
gary.chen@sce.com

Docket# 2022-ARC

November 4, 2024

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

SUBJECT: Southern California Edison Company's Response to the Office of Energy Infrastructure Safety's 2022 Annual Report on Compliance

Dear Mr. Doherty:

Southern California Edison Company (SCE) respectfully submits this response to the Annual Report on Compliance (Energy Safety ARC or the ARC) for SCE's 2022 Wildfire Mitigation Plan (WMP) issued by the Office of Energy Infrastructure Safety (Energy Safety) on October 21, 2024.

INTRODUCTION

SCE appreciates the opportunity to provide this response to the ARC, which reflects Energy Safety's evaluation of SCE's compliance with its 2022 WMP. Energy Safety concluded that "SCE undertook significant efforts in 2022 to reduce its wildfire risk through the achievement of most of its initiatives and program targets."¹ Energy Safety also acknowledged that "[o]n balance, SCE was largely successful in executing its plan for wildfire risk mitigation."²

In the comments below, SCE focuses on two aspects of the ARC that are important to clarify for purposes of future compliance assessments: (1) SCE provides additional information in response to Energy Safety's commentary concerning SCE's identification, tracking, and reporting on its WMP initiatives, and (2) SCE reiterates its concern regarding the use of outcome metrics to retrospectively evaluate compliance with an approved WMP.

SCE'S WMP REPORTING FOLLOWS ESTABLISHED PROCEDURES AND REPORTING REQUIREMENTS

Energy Safety states that "SCE's inconsistent WMP initiative reporting created a challenge for Energy Safety's assessment of compliance" and that "SCE must improve the consistency and transparency of in (Sic) initiative identification and tracking, including the financial

¹ Energy Safety ARC, p. 2.

² Energy Safety ARC, p. 2.

reporting.”³ SCE disagrees with the suggestion that it has not been transparent in its reporting to Energy Safety. SCE submits Quarterly Data Reports (QDR) in accordance with Energy Safety’s Standard Guidelines for Spatial and Non-Spatial Tables submission. SCE has consistently reported using the same schema and works in close collaboration with Energy Safety and the other large investor-owned utilities (IOUs) to ensure proper reporting.

In Table 3 of the ARC,⁴ Energy Safety lists “nine initiatives that were unaccounted for in other documents and for which Energy Safety requested additional information through a data request.” SCE did not include these nine initiatives in its 2022 QDR or SCE’s WMP Annual Report on Compliance (the Electrical Corporation ARC, or EC ARC) due to guidance from Energy Safety, which states that utilities should report initiatives with “a numeric target value that is the projected target for end of year.”⁵

SCE interpreted this guidance as referring to the WMP initiatives and targets included in Table 5.3-1 in Section 5.3: Plan Program Targets of SCE’s 2022 WMP, as that table defines the portfolio of wildfire mitigation initiatives undertaken by SCE and their associated 2022 targets. The programs in Section 5.3 are uniquely distinguished by the naming convention of a prefix indicating the functional area (e.g., “SH” for system hardening or “IN” for inspections), and they also form the basis of the “heatmap” with green/yellow/red status reporting provided to Energy Safety quarterly as an indication of overall WMP status and compliance. Hence, SCE has understood that the activities in Section 5.3 serve as the defined population of WMP “initiatives” or “activities.”

The ARC also lists seven initiatives in Table 7: SCE Quantitative WMP Initiatives with Dissonance.⁶ SCE responds to each instance below:

- Intrusive Pole Inspections (7.3.4.6)
 - Issue: Values not reported in QDR, EC ARC, or IE ARC.
 - SCE response: The number of intrusive pole inspections was not reported in the filings listed above because that program is not included in SCE’s 2022 WMP Section 5.3.
- Transmission HFRI Inspections and Remediations (IN-1.2)
 - Issue: Values differ between the QDR and EC ARC.
 - SCE response: Energy Safety ARC Table 7 refers to a value of 16,702, which is from the third quarter QDR. In the fourth quarter QDR, SCE reported a value of 17,133, which is consistent with the EC ARC.⁷
- Customer Care Programs (PSPS-2)
 - Issue: Values differ between the QDR and EC ARC.
 - SCE response: This is a timing issue, as the EC ARC is submitted a month after the QDR and may include updated information at the time of submission. SCE indicated in the EC ARC that values differed from the fourth quarter QDR.⁸

³ Energy Safety ARC, p. 1.

⁴ Energy Safety ARC, p. 27.

⁵ Final 2022 Wildfire Mitigation Plan Update Guidelines, p. 53.

⁶ Energy Safety ARC, Appendix A, p. 64.

⁷ EC ARC, Attachment A, p. 8.

⁸ EC ARC, Attachment A, p. 15.

- Covered Conductor (SH-1)
 - Issue: Values differ between the QDR and EC ARC.
 - SCE response: This is a timing issue, as the EC ARC is submitted a month after the QDR and may include updated information at the time of submission. SCE indicated in the EC ARC that values differed from the QDR.⁹
- Undergrounding Overhead Conductor (SH-2)
 - Issue: Values differ between the QDR and EC ARC.
 - SCE response: This is a timing issue, as the EC ARC is submitted a month after the QDR and may include updated information at the time of submission. SCE indicated in the EC ARC that values differed from the QDR.¹⁰
- Detailed Inspections and Management Practices for Vegetation Clearances around Transmission Infrastructure Lines and Equipment (7.3.5.3)
 - Issue: Difference in target value between the QDR and EC ARC.
 - SCE response: This is a timing issue. The change to the target value had not been approved by Energy Safety when the QDR was submitted. The EC ARC and IE ARC were submitted after the change to the target value had been approved and reflected the lower value.
- New Technologies and Innovations/Alternate Technology Pilot Programs (7.1.E)
 - Issue: Values not reported in QDR, EC ARC, or IE ARC.
 - SCE response: The pilot programs were not reported in the filings listed above because the programs are not included in SCE’s 2022 WMP Section 5.3.

SCE reiterates that comparisons between the QDR and the EC ARC are likely to identify differences in data given the EC ARC is submitted nearly two months after the fourth quarter QDR and reflects updated information and the latest data validation. SCE strives to make the EC ARC representative of its final program target achievement values, and as such considers the EC ARC as the authoritative source of information in the case of differences with the QDR.

THE RETROSPECTIVE USE OF OUTCOME METRICS TO ASSESS WMP COMPLIANCE SHOULD BE DISTINGUISHED FROM THE PROSPECTIVE USE OF SUCH METRICS TO ASSESS WMP EFFECTIVENESS

In Section 6 of the ARC, Energy Safety explains that its assessment extended “beyond assessing compliance with WMP initiatives” to also examine “the ultimate performance of an electrical corporation’s infrastructure relative to its wildfire risk, as measured by changes in the occurrence of events that correlate to wildfire risk.”¹¹ The ARC notes several statistics, including the number of ignitions, wire down events, unplanned outages, and Public Safety Power Shutoff events within SCE’s service area from 2015 to 2022 as part of an assessment of the “electrical corporation’s infrastructure performance.”¹²

⁹ EC ARC, Attachment A, p. 5.

¹⁰ EC ARC, Attachment A, p. 5.

¹¹ Energy Safety ARC, p. 38.

¹² Energy Safety ARC, p. 39.

Consistent with SCE’s prior comments on the proper role of outcome metrics,¹³ SCE reiterates that such 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. SCE is committed to implementing measurable wildfire mitigation plans intended to reduce the risk of catastrophic wildfires associated with its electrical infrastructure. Through an extensive process including collaboration with Energy Safety, SCE developed a comprehensive WMP aimed at reducing wildfire risk, which was vetted by multiple stakeholders, approved by Energy Safety, and ratified by the Commission. The question of whether SCE subsequently complied with its WMP is distinct from the question of how certain risk events or yearly changes in risk metrics demonstrate “performance of an electrical corporation’s infrastructure.” In other words, 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 of whether or not a utility executed the tasks in, and complied with, its approved WMP. This is particularly true because outcome metrics are dependent on a number of factors such as weather conditions and fuel moisture which are outside of a utility’s control.

Once Energy Safety has approved a WMP 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 appreciates the opportunity to provide this response to the ARC and looks forward to continued collaboration with Energy Safety to ensure the successful mitigation of wildfire risk in its service area. If you have questions, or require additional information, please contact me at gary.chen@sce.com.

Sincerely,

//s//

Gary Chen

Director, Safety & Infrastructure Policy

¹³ See, e.g., November 28, 2022 Opening Comments on Draft Annual Report on Compliance for Southern California Edison’s 2020 Wildfire Mitigation Plan, pp. 2-3, available at [SCE Opening Comments on ES Draft ARC SCE 2020 WMP](#).