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Tony Marino
Acting Deputy Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Opening Comments on the Draft WMP Guidelines - Package 1

Dear Acting Deputy Director Marino:

Southern California Edison (SCE) appreciates the opportunity to provide the following opening comments on the Draft WMP Guidelines – Package 1 (Draft Guidelines) that was issued by the Office of Energy Infrastructure Safety (Energy Safety) on November 12, 2024, and that was supplemented by a public workshop on November 26.

A COMPREHENSIVE WMP BASE PLAN REQUIRES SUFFICIENT DEVELOPMENT TIME

Given the extensive nature of a WMP Base Plan (SCE's 2023-2025 WMP was nearly 1,000 pages, not including Supporting Documents), SCE respectfully requests that Energy Safety provide guidance as soon as possible on the 2026-2028 WMP submission deadline. The submission deadline should reflect that the Draft Guidelines were only recently released on November 12 and should provide adequate time for utilities to conduct the considerable analysis required to produce a comprehensive, three-year WMP.

The draft guidelines for the 2025 WMP Update, which was significantly shorter and less complex than the upcoming 2026-2028 Base Plan, were issued on October 30, 2023, and the 2025 WMP Update was due on April 1, 2024. Thus, Energy Safety afforded utilities five months to review and evaluate the guidelines, and to prepare the 2025 WMP Update. SCE suggests a similar timeframe for the 2026-2028 WMP, which would result in a submission deadline no earlier than mid-April 2025. SCE's recommended schedule is necessary to provide utilities with adequate time to prepare a thoughtful, responsive, and complete WMP. Such a timeline would also provide Energy Safety and stakeholders sufficient time to conduct discovery after filing.

A PETITION TO AMEND PROCESS SHOULD NOT REPLACE A CHANGE ORDER PROCESS

Pages 158-159 of the Draft Guidelines describe a petition to amend process that would allow a utility to amend its approved WMP to align it with a General Rate Case (GRC) decision. SCE appreciates the need for such a process and its inclusion in the draft guidelines, but notes that a change order process should be preserved to allow utilities to make justifiable changes to targets for reasons other than GRC decisions.

WMP mitigation activities, especially those with targets forecast as far as three years in advance of a plan year, can experience justifiable reasons for changes. Program learnings, new technology,

changes in risk or strategy, and changing conditions can yield scenarios when a change to a program target would allow for more prudent wildfire mitigation approaches that may not be known when the utility submits either its base WMP or an update WMP.

SCE is concerned by verbal comments during the public workshop that seemed to indicate in-year target changes would be reviewed during the compliance process after the completion of the plan year. This would create unreasonable uncertainty for the utilities, as it would not allow timely regulatory input from Energy Safety on the permissibility of target changes.

Preserving the change order process would allow utilities to submit justifiable changes to program targets for Energy Safety review and disposition, and would not compromise Energy Safety’s ability to determine if proposed target changes would be allowed.

TABLE 6-3 SHOULD BE REVISED TO BETTER REFLECT MEANINGFUL COST-BENEFIT SCORES

On page 70 of the Draft Guidelines, Table 6-3 calls for three cost-benefit fields representing overall risk, wildfire risk, and outage program risk (see highlights below):

Table 6-3. Example of Risk Impact of Initiative Activities.⁵³

Initiative Activity	Initiative Activity Section #	Activity Effectiveness – Overall Risk	Activity Effectiveness – Wildfire Risk	Activity Effectiveness- Outage Program Risk	Cost-Benefit Score - Overall Risk	Cost-Benefit Score - Wildfire Risk	Cost-Benefit Score – Outage Program Risk	% HFRA Covered	Expected % Risk Reduction ⁵²	Model(s) Used to Calculate Risk Impact
Covered Conductor Installation	8.2.1	70%	75%	65%	6.238	6.748	5.978	14.12%	9.1%	WRRM
Undergrounding	8.2.2	95%	92%	98%	7.452	7.236	7.944	2.75%	2.61%	WRRM

Cost-benefit scores cannot be calculated in this fashion because the costs cannot be disaggregated to individual component risks. In other words, using the covered conductor example, the overall cost-benefit score can be calculated by dividing the total mitigation costs over total mitigation benefits. The resulting ratio would reflect the overall cost-benefit score of covered conductor’s cumulative effect on both wildfire risk and outage program risk.

However, to calculate a cost-benefit score only for wildfire risk and only for outage program risk, one would need to assume which portion of the costs to allocate to those two risks, as it would be mathematically incorrect to disaggregate the wildfire risk benefits and the outage program risk benefits but to not also disaggregate the costs. SCE cannot do this in a meaningful way, as the mitigation costs represent a single mitigation activity and cannot be split into a “wildfire portion” or an “outage program portion” without resorting to arbitrary assumptions.

SCE suggests keeping the column for overall cost-benefit ratio, as it can be calculated, but removing the two columns that would attempt to disaggregate the overall ratio into a wildfire component and an outage program component.

ENTERPRISE SYSTEMS SHOULD NOT REQUIRE QUANTITATIVE TARGETS

Pages 150-151 of the Draft Guidelines require qualitative and quantitative targets for Enterprise Systems. SCE is not opposed to the use of qualitative targets for enterprise systems to define milestones for system development and/or improvements. However, enterprise systems serve as an enabler for other initiatives that more directly reduce wildfire risk and do not intuitively lend themselves to quantitative targets as defined in the Draft Guidelines.

SCE recommends only requiring qualitative targets for enterprise systems, leaving quantitative targets for operational activities that better lend themselves to unit-based targets that are deployed in specific physical locations and directly result in measurable risk reduction.

CONCLUSION

SCE appreciates the opportunity to provide these opening comments on the Draft Guidelines. If you have questions, or require additional information, please contact me at gary.chen@sce.com.

Sincerely,

//s//

Gary Chen

Director, Safety & Infrastructure