



Gary Chen
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Docket: WMP-Guidelines

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

SUBJECT: Reply to Comments on Draft WMP Guidelines - Package 1

Dear Acting Deputy Director Marino:

Southern California Edison Company (SCE) appreciates the opportunity to respond to opening comments on the Draft WMP Guidelines – Package 1 (Draft Guidelines) that were submitted by stakeholders on December 6, 2024.

Parties who submitted comments on the Draft Guidelines include Pacific Gas & Electric (PG&E), San Diego Gas & Electric (SDG&E), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), and the Green Power Institute (GPI).

ALL COMMENTING PARTIES AGREE THAT THE WMP DEADLINE SHOULD BE REASONABLE

PG&E, SDG&E, Cal Advocates, and GPI commented¹ on the need for a WMP submission deadline that provides adequate time for the utilities to develop their WMPs. While stakeholders’ proposed dates for the WMP submission deadline ranged from mid-March to June 2025, the unanimous theme was that, at a minimum, a February 2025 deadline would not provide utilities with sufficient time to prepare their 2026-2028 WMPs.

SCE appreciates the consensus on this topic and respectfully suggests that Energy Safety consider a WMP pre-submission deadline in April 2025, which would be consistent with the timeframe provided for the 2025 WMP Update.

THE CHANGE ORDER PROCESS SHOULD NOT BE ELIMINATED

SDG&E stated that, “In eliminating the change order approach, the Draft Guidelines fail to address all instances where an electrical corporation, ratepayers, or other stakeholders might benefit from changes to an approved WMP. These could include changes to risk analyses, new data or information, or changes to regulatory requirements.”²

PG&E stated that, “PG&E asks Energy Safety to reinstate a process similar to the current change order process whereby a utility may request changes to targets—including an increase, decrease, or

¹ PG&E comments, p. 3; SDG&E comments, pp. 1-2; Cal Advocates comments, pp. 15-16; GPI comments, p. 3.

² SDG&E comments, p. 4.

program termination—and receive timely feedback to enable the utility to integrate that feedback into the next plan year.”³

SCE supports these comments on the change order process. Such a process is necessary to facilitate potential changes to an approved WMP. For example, SCE will submit a Risk Assessment and Mitigation Phase (RAMP) plan in 2026, which may result in updates to risk models and inputs based on this refreshed data, with the potential for subsequent impacts on WMP targets. SCE also recently submitted⁴ a Petition for Modification (PFM) to the California Public Utilities Commission (CPUC) to update its High Fire Threat District (HFTD) boundaries, which may result in the need for changes to WMP targets that may not be known until the CPUC considers and rules on proposed modifications to HFTD boundaries.⁵

The examples above further supplement the points that SCE, PG&E, and SDG&E made in opening comments on why justifiable changes may be needed for targets that could not be addressed through (1) the Petition to Amend process or (2) through future WMP Updates. SCE respectfully suggests that Energy Safety preserve the Change Order process to allow utilities an opportunity to propose WMP target changes outside of those two primary mechanisms.

RISK TOLERANCE SHOULD NOT BE ADDRESSED IN THE WMP

The Draft Guidelines state the following consideration for identifying and evaluating initiative activities in Section 6.1.3.1:

How the electrical corporation defines different aspects of risk considerations, including: Risk Attitude, Risk Tolerance, Uncertainty, and Tail Risk in its risk mitigation strategies.

- *Must break out each by safety and reliability (PSPS and PEDS), as applicable*
- *Must include a discussion of how each aspect impacts mitigation selection and prioritization*

GPI states that it “anticipates that this requirement to define utility risk tolerance, risk attitude, and uncertainty will have little to no material effect on wildfire risk mitigation solutions... Risk tolerance and risk attitude is already baked into the existing wildfire risk management planning standard and WMP evaluation guidelines. The existing wildfire risk management planning standard targets no catastrophic wildfires.”⁶

³ PG&E comments, p. 2.

⁴ SCE’s Petition For Modification of Decision 17-12-024 To Update High Fire Threat District Boundaries In Its Service Territory (Nov. 8, 2024), available at <https://www.sce.com/safety/wild-fire-mitigation>

⁵ See Proposed Decision Denying Petition to Modify Decisions 17-01-009, 17-12-024 and 20-12-030 and Dismissing Petition to Modify Decision 17-12-024 Without Prejudice (Nov. 11, 2024), p. 1, available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M549/K170/549170297.PDF> (“The Commission intends to initiate a new rulemaking to consider modifications to the High Fire-Threat District boundaries”).

⁶ GPI comments, p. 17.

SCE agrees with GPI that the existing wildfire risk management planning standard already presumes a level of risk tolerance. Further, risk tolerance issues are already being litigated within the Risk-Based Decision-Making Framework (RDF) proceeding.⁷ Since risk tolerance is being considered in that forum, SCE strongly suggests that Energy Safety remove the risk tolerance requirements from the Draft Guidelines to prevent the possibility of Energy Safety premature guidance on risk tolerance issues or guidance that could conflict with the decisions in the RDF proceeding.

For those reasons, SCE recommends removing the above-cited language from Section 6.1.3.1 of the Draft Guidelines.

EXPANDING THE SCOPE OF REPORTED IGNITIONS WITHIN THE WMP WOULD ADD NEEDLESS COMPLEXITY AND BE REDUNDANT WITH EXISTING REPORTING

Cal Advocates states that “Utilities should be required to augment their geospatial data submissions to include smaller, potentially non-reportable ignitions that are currently excluded”⁸ and “identify the causes of all utility-related wildfires in their territories, not just catastrophic ones.”⁹

Cal Advocates’ suggestions are (1) unwarranted and (2) unnecessary given existing reporting of ignition data. First, the suggestion to expand geospatial data submissions “to include smaller, potentially non-reportable ignitions” is unwarranted because it is inconsistent with Assembly Bill 1054. Assembly Bill 1054 requires utilities to develop WMPs with “preventive strategies and programs...to minimize the risk of its electrical lines and equipment causing *catastrophic wildfires*.”¹⁰ Table 4-2 aligns with the relevant statutory language by focusing on catastrophic wildfires and should not be modified.

Second, Cal Advocates’ request is unnecessary given existing reporting of ignition data to the CPUC’s Safety and Enforcement Division.¹¹ That data includes ignition date, location, suspected cause, size, equipment and outage information for any fire spreading more than one linear meter in any direction from the point of ignition.

CONCLUSION

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

Sincerely,

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Gary Chen

Director, State & Infrastructure

⁷ R.20-07-013, Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities.

⁸ Cal Advocates comments, p. 12.

⁹ Cal Advocates comments, p. 13.

¹⁰ Public Utilities Code § 8386(c)(3) (emphasis added).

¹¹ See [D.14-02-015](#), Decision Adopting Regulations To Reduce The Fire Hazards Associated With Overhead Electric Utility Facilities And Aerial Communications Facilities, Appendix C.