December 23, 2024 **Via Electronic Filing**

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
Sacramento, CA 95814
https://efiling.energysafety.ca.gov/

Subject: Comments of the Public Advocates Office on Draft Data Guidelines V. 4.0

Docket: Data Guidelines

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments regarding the Draft Data Guidelines Version 4.0, which the Office of Energy Infrastructure Safety issued on November 19, 2024. 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.

Respectfully submitted,

/s/ ***Marybelle Ang***

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I. INTRODUCTION

On November 19, 2024, Energy Safety issued version 4.0 of its Draft Data Guidelines (Draft Data Guidelines) and invited the public to submit comments by December 18, 2024.[1] On December 16, 2024, Energy Safety hosted a workshop regarding the Draft Data Guidelines for wildfire mitigation plans (WMPs). Pursuant to the cover letter of the Draft Data Guidelines, Cal Advocates timely submits these comments. Our recommendations aim to improve the clarity, transparency, and overall effectiveness of the Draft Data Guidelines to ensure that they serve the needs of all stakeholders.

II. TABULAR DATA REQUIREMENTS

A. Energy Safety should enhance the reporting requirements in Table 13.

Table 13 in the Draft Data Guidelines is an important component of WMP data. The Draft Data Guidelines require utilities to provide data on all open asset maintenance work orders in Table 13.[2] To maximize the value of this data, Energy Safety should issue more explicit guidelines that improve consistency and granularity. By implementing the enhancements described below, Energy Safety can transform Table 13 into a more effective tool for assessing utilities' open asset work orders and evaluating resource allocation. Ultimately this will ensure that utilities effectively address the most risky areas.

1. Energy Safety should add an Ignition Risk flag for prioritization.

Cal Advocates has previously raised concerns over utility backlogs of open and overdue work orders.[3] PG&E subsequently developed a plan to address the portion of its

[1] Office of Energy Infrastructure Safety, *Draft Data Guidelines Version 4.0*, November 19, 2024, docket Data Guidelines (Draft Data Guidelines).

[2] Draft Data Guidelines at 165-167.

[3] *See, e.g.*, *Comments of the Public Advocate's Office on the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities*, April 11, 2023 at 25-29.

maintenance backlog that presents an "ignition risk."[4] Currently, however, Table 13 does not include sufficient information to allow an evaluation of PG&E's progress toward eliminating its backlog of "ignition-risk" work orders.

Energy Safety should revise the Draft Data Guidelines to include an ignition risk field. This field would indicate whether each asset work order poses a potential ignition risk (yes/no). This field would help stakeholders identify and monitor asset work orders with a heightened risk of ignition.

2. Energy Safety should include circuit identification for granularity.

Energy Safety should require utilities to include both the associated circuit name and circuit ID number for each work order in Table 13. This addition would improve the granularity of the data, allowing for a more detailed analysis, such as identifying recurring delays in addressing infrastructure issues on specific circuits.

3. Energy Safety should incorporate geographic coordinates for GIS analysis.

Energy Safety should add fields for geographic latitude and longitude (limited to seven decimal places) to Table 13. This spatial data is indispensable for enabling GIS analysis to identify patterns and trends, such as clustering of work orders in high-risk areas.

4. Energy Safety should include defect descriptions for filtering and analysis.

Table 13 currently includes a field for the type of equipment involved in each open work order. However, it does not include the nature of the specific defect that resulted in the work order. Energy Safety should require utilities to include damage codes or other internal defect descriptions for each work order in Table 13. This detailed information allows for sorting and filtering by specific keywords to identify damage types and identify trends.

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[4] *See, e.g.*, PG&E, *2023-2025 Wildfire Mitigation Plan*, March 27, 2023, Section 8.1.7.2 Open Work Orders – Distribution Tags.

B. Energy Safety should integrate GIS data in Table 15.

The Draft Data Guidelines require utilities to provide a summary of the circuits, segments, or spans that "significantly" contribute to risk in Table 15.[5] To complement this table, Energy Safety should require utilities to include geospatial data for the same set of circuits, segments, or spans included in Table 15. The geospatial data should include all the same information as in Table 15 as attributes. Additionally, both Table 15 (in tabular form) and the corresponding geospatial data should include unique identifiers to enable matching.

Energy Safety should require utilities to submit the geospatial data that corresponds to Table 15 with the utility's most recent geospatial data submission prior to each WMP submission.[6] This would enable stakeholders to visualize the highest-risk locations and evaluate them with respect to planned wildfire mitigation activities, recent risk events, open work orders, or other potential risk factors.

III. PROCEDURAL ISSUES

A. Energy Safety should host future workshops shortly after Draft Data Guidelines are posted.

In January 2024, Energy Safety hosted a public workshop on revised data guidelines after written comments on the guidelines were submitted.[7] For future revisions, Energy Safety should host a workshop one to two weeks after the new draft guidelines are issued. This timeframe would provide enough time for stakeholders to review the document and identify issues before the workshop. Making this change will improve the stakeholder process and engagement for future changes to the Draft Data Guidelines.

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[5] Draft Data Guidelines at 169-171.

[6] In recent years, WMPs have been filed in late winter or early spring, so the most recent geospatial data submission would be quarter 4 of the prior year.

[7] For Draft Data Guidelines v3.2, written comments were due on January 16, 2024. However, Energy Safety hosted the Draft Data Guidelines v3.2 workshop on January 30, 2024.

IV. CONCLUSION

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed in these comments.

Respectfully submitted,
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