

December 23, 2024

VIA E-MAIL

Shafi Mohammed
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Office of Energy Infrastructure Safety

Re: California Association of Small and Multi-Jurisdictional Utilities Comments on Draft Data Guidelines v4.0

Bear Valley Electric Service, Inc., Liberty Utilities (CalPeco Electric) LLC, and PacifiCorp, d.b.a. Pacific Power (collectively, the California Association of Small and Multi-Jurisdictional Utilities (“CASMU”)), respectfully submit these comments on the *Draft Data Guidelines v.4.0* issued on November 19, 2024 (“Draft Data Guidelines”).

I. The Draft Data Guidelines Should be Amended to Reduce Duplicative Reporting Requirements

CASMU’s comments focus on aligning the Draft Data Guidelines with the broader Wildfire Mitigation Plan (“WMP”) reporting process. To accomplish that goal, CASMU recommends that the Annual-WMP Tabular Wildfire Mitigation Data (“Annual-WMP Mitigation Data”) be included as a tab in the Microsoft Excel WMP Workbook that is submitted to the Office of Energy Infrastructure Safety (“Energy Safety”) as part of a Base WMP or WMP Update filing rather than as a separate submission filed three days before the Base WMP or WMP Update filing.¹

¹ Office of Energy Infrastructure Safety, Draft Wildfire Mitigation Plan Guidelines, p. 4, Sec. 2.1.1 (Issued November 12, 2024); Office of Energy Infrastructure Safety, Draft Data Guidelines v4.0, p. 4, Sec. 2.1 (Issued November 19, 2024).

As currently written, the Draft Data Guidelines require utilities to file a subset of the data they would already provide in the WMP Workbook as an independent submission. As outlined in the Draft Data Guidelines, “[t]he timeframe of targets, projections, and risk data reported in the [Annual-WMP Mitigation Data] submission are directly related to the electrical corporation’s WMP and must be consistent with how targets, projections, and risk data are reported and discussed in the electrical corporation’s WMP.”² The timeframes, projects, and risk data are so closely linked that:

...targets, projections, and risk data in an Annual-WMP data submission for Year 1 will contain data for Years 1, 2 and 3, and **must match** targets, projections, and risk data provided in the electrical corporation’s corresponding Base WMP. An Annual-WMP data submission for Year 2 will contain data for Years 2 and 3, and must match targets, projections, and risk data provided in the electrical corporation’s corresponding WMP Update.³

Despite the close relationship between both filings, the Annual-WMP Mitigation Data to be submitted by utilities three days before the Base WMP or WMP Update is not currently part of the WMP Workbook, nor is it presented in the same format. Given the overlap in the reporting requirements contemplated in the Draft Data Guidelines and the Draft Wildfire Mitigation Plan Guidelines, CASMU recommends that Energy Safety eliminate the currently proposed standalone Annual-WMP Mitigation Data submission and instead allow utilities to include the Annual-WMP Mitigation Data within the existing WMP Workbook as a separate tab. Incorporating the Annual-WMP Mitigation Data within the WMP Workbook streamlines the WMP reporting process for utilities, reduces duplicative reporting requirements, and maintains Energy Safety’s oversight responsibilities by providing the same information to Energy Safety.

² Draft Data Guidelines v4.0, Sec. 2.5.2.

³ Draft Data Guidelines v4.0, Sec. 2.5.2 (emphasis added).

II. Conclusion

CASMU appreciates this opportunity to provide comments on Energy Safety's Draft Data Guidelines and looks forward to working with Energy Safety and other interested stakeholders to further refine and improve the WMP reporting requirements. CASMU requests that the Draft Data Guidelines be modified as recommended herein to eliminate the requirement to submit Annual-WMP Mitigation Data three days before Base WMPs or WMP Updates, and simplify and streamline utility reporting by aligning the Annual-WMP Mitigation Data submission with the broader WMP framework by reporting Annual-WMP Mitigation Data as part of the Base WMP or WMP Update.

Respectfully Submitted,

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