BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE STATE OF CALIFORNIA

Office of Energy Infrastructure Safety
Natural Resources Agency

COMMENTS OF THE GREEN POWER INSTITUTE ON THE DRAFT WMP DATA GUIDELINES

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The Green Power Institute (GPI), the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security, provides these *Comments of the Green Power Institute on the Draft WMP Data Guidelines*.

Minor Revisions

- Establish machine readable Filed Names. Ampersands and spaces in Utility_ID[s] do not provide value and are operators.[1] Simplify UTILITY_ID[s] to PGE, SDGE, and LSPower.
- Revise example METRIC NUMBER to lead with "2" for the Annual WMP Template Metric Number ID value.[2]
- Revise the Data Guidelines and/or WMP Guidelines to consistently retain or eliminate the Change Order process.[3]
- Some Field Name fields are excessively long and descriptive, effectively containing the Field Description and Field Values within the Name. Shorten Field Names to the extent possible, removing Field Description entries from the Field Name, and defining Field Description entries in the respective column. Examples:

Field Name	Field Description	Field Value
RISK EVENT DRIVER TRACKED ~~ARE RISK EVENTS TRACKED FOR IGNITION DRIVER? (YES / NO)~~[4]	Whether this category of risk events is tracked for ignition driver. Values are as follows: Y, N	Text, Restricted to values indicated in Field Description
DUE DATE OF MODIFIED WORK ORDER ~~DUE DATE OF THE WORK ORDER AFTER IT WAS REINSPECTED OR MODIFIED (IF APPLICABLE)~~[5]	~~See Field Name~~ Due date of the work order after it was reinspected or modified (if applicable)	Date

- Table 3: List and Description of Additional Metrics does not require or differentiate between projection versus actual metrics. Utility additional metrics presumably have actuals as well as projections since metrics are generally selected to track plan success. The Data Guidelines eliminate

[1] Draft Data Guidelines V40 Redline, p. 160.
[2] Draft_Tabular_Wildfire_Wildfire_Mitigation_Data_AnnualWMP_Template_Workbook, 11/19/2024, Tables 14-15.
[3] WMP Data Guidelines V40 Redline, p. 163.
[4] Data Guidelines v40 Table 5, Row 1.
[5] Data Guidelines v40 Table 13.

Table 3 from the Annual WMP tabulated data filing and access to any utility projections for additional metrics would have to be requested via a Data Request. Updating the Data Guidelines for Table 3 to require congruent reporting of any additional metric projections in the Annual WMP data filings.

Overhaul the WMP and Data Guidelines to utilize consistent and precise terminology

Apply precise and consistent hierarchical terminology throughout the WMP and Data Guidelines to clarify the level of detail that is required for WMP and data reporting. Widespread inconsistencies are confusing and may inadvertently lead to less rigorous reporting requirements compared to earlier iterations of the data guidelines. Eliminate all compound hierarchical terms, including the terms "initiative category" and "initiative activity" and instead simply use the terms "category", "initiative," and "activity."[e.g.6]

Data Guideline Appendix C and the new/revised Annual WMP (projections), Annual EOY (actuals), and QDR (actuals) data tables ***could result in electrical corporations reporting lower resolution targets and costs than prior data filings***. For example, Applying Appendix C to Table 11, the guidelines instruct electrical corporations to report costs for "Vegetation Management Inspections" which equals the *total cost* to implement all work completed under Section 9.2 of the WMP. ***This*** will ***reduce the resolution of reporting,*** for example compared to PG&E's 2023 QDR Table 11[7] Similar issues can arise for other Excel data tables.[e.g.8]

Example: Appendix C, Table Field Names and widespread terminology inconsistencies.
The Appendix C table states that it applies the definitions of Initiatives and Categories "for the purposes of populating data submission fields related to WMP Initiative Category and WMP Initiative Classifications."[9] However, this statement and schema (1) conflicts with past QDR Initiative versus Activity classifications; (2) conflicts with the Draft WMP Guidelines-Package 1; (3) conflicts with other data terminology and classifications in the Data Guidelines; and (4) could remove reporting detail provided in earlier data reporting versions (i.e. QDR).

Data Guidelines Appendix C appears to list both initiatives and activities under the third column labeled "WMP Initiative." For example, Section 8.2.1 Covered Conductor Installation (Level 3) is technically one "activity" of the Grid Design and System Hardening "initiative." *This is specifically defined in the*

[6] Ibid, p. 203.
[7] PGE_2023_Q4_Tables115_R2.xlsx.
[8] PGE_2023_Q4_Tables115_R2.xlsx.
[9] WMP Data Guidelines V40 Redline, p. 203.

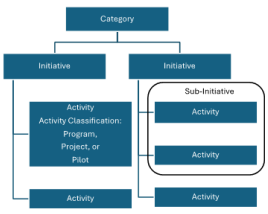
WMP Guidelines - *Package 1*.[10] Redefining Covered Conductor Installation as an Initiative in Data Guidelines Appendix C is inconsistent with the Draft WMP Guidelines – Package 1. Prior QDR formats (e.g. PG&E's 2023 Q4 R2 QDR, Table 11) list "Covered Conductor Installation" as an "Initiative Activity."

GPI strongly recommends revising and updating all hierarchical terminology across the WMP and Data Guidelines from the bottom-up, to ensure the terminology and reporting requirements are internally consistent and precise. By bottom-up, GPI means that all Categories, Initiatives, and Activities should be mapped out, standardized, and reported in unifying Appendices added to all Guideline documents. As part of this effort, GPI recommends heavily revising Appendix C "WMP Initiative Classification." Revise both the WMP and Data Guidelines to include updated and clearer definitions of WMP hierarchical terms and provide a graphical and tabulated schematic (Figure 1, Table 1). For the Data Guidelines, this should include adding all hierarchal terms and definitions to the Appendix B Glossary. Also add definitions for "Project", "Program," and "Pilot" to the WMP Guidelines Appendix A Definitions and Data Guidelines Appendix B Glossary. Rename WMP Guideline Appendix A as "Glossary." Eliminate all uses of compound hierarchical terms (e.g. Initiative Activities and Initiative Categories).

GPI proffered an alternative hierarchical nomenclature in our Reply Comments on the Draft WMP Guidelines – Package 1.[11] We offer a revised version here with the additional benefit of a holistic view of the WMP and Data Guidelines and to account for additional terminology in the Data Guidelines (i.e. Programs, Projects, Pilots).

- Categories Example: Vegetation Management and Inspections (WMP Section 9).
- Initiatives Example, Vegetation Inspections (revised WMP Section 9.2) and Vegetation Management (new WMP Section 9.3).
- Activities Example: Vegetation Inspections - LiDAR (WMP Section 9.2.n). Activity classifications include one of three types: Programs, Projects, or Pilots

Figure 1. Example of hierarchical nomenclature schematic for WMP and Data Guidelines



[10] Draft WMP Guidelines – Package 1, p. 78.
[11] GPI Reply Comments on the Draft WMP Guidelines. p. 6.

Table 1. GPI recommends providing a tabulated hierarchical guide

Revised Appendix C	WMP SECTION	WMP CATEGORY	WMP INITIATIVE	WMP ACTIVITY
	9.2.n	Vegetation Management and Inspection	Vegetation Inspections	e.g. 1. Distribution Patrol n. …

WMP data tables should generally require utilities to report on Activity targets (projections and actuals) and costs. Some target and cost reporting requirements may be more suitably reported at a Category, Initiative, or sub-Initiative level. The minimum required data reporting level for each WMP sub-section should be specified in an updated Appendix C.

Minimize the number of workbooks required to analyze utility trends over a 3-year WMP cycle and balance functionality for Excel and computing platforms

The reporting schema for revised Table 1 and other revised QDR and Annual WMP tables is not congruent and will likely create more work. For example, the Q4 QDR Table 1 will show the trajectory of progress towards end of year actuals as well as the cumulative end of year actuals.[12] Whereas, Quarterly Table 2 will only provide risk event counts for the specific reporting year and quarter (e.g. 2025 Q3). Reviewers (public, OEIS, stakeholders) will need to source data from **12** Quarterly reports to conduct a performance metric trend analysis over a 3-year WMP cycle. Analyzing utility progress based on the new Quarterly Workbooks will be cumbersome for evaluators who have technical data analysis experience and will present a major roadblock to the public and to public transparency.

Revised Quarterly tables should include quarterly data for the entire reporting-year. All Quarterly data tables should also consistently require either individual or cumulative quarterly values. This way a single Q4 Quarterly filing will contain all actual data for the reporting year. Ultimately, all Excel Workbooks required in the Data Guidelines should be revised to minimize the number of workbooks that must be collated to analyze utility trends over a 3-year WMP cycle and support "one-stop-shop" reviewing.

Excel Workbook filings for each 3-year WMP cycle will significantly hinder public transparency and increase review time

Based on the Draft WMP Guidelines and Draft Data Guidelines we anticipate upwards of 21 separate Excel Workbook filings over a 3-year WMP Cycle, not including revisions. The proposed revisions

[12] WMP Data Guidelines, p. 163.

eliminate data tables that would allow a member of the public to review utility plan to actuals by opening a *single* file. GPI views this as making utility projection to actual target tracking much more complex for the public, effectively reducing public transparency. This is a major concern and should be remedied not by adding more data table filing requirements, but by strategically revising the Workbooks that are already proposed. The revised tabulated data filings will also likely prove more time consuming for stakeholders, utilities, and possibly the OEIS unless it has already developed updated Workbook processing scripts in a computing platform (e.g. Python, MATLAB).

Reduce tabulated data redundancies to the maximum extent possible

The 21 Excel Workbooks filings over the 3-year WMP cycle include redundant tabulated data in slightly different formats and classified under different terminologies. Redundant data reporting takes time away from other important work and costs ratepayer money. Redundant data reporting spread across multiple filings can also increase the likelihood of reporting errors and inconsistencies across filings. Revising a single value (e.g. errata) would require revisions to all filings and tables where that value is reported, triggering a cascade of muitple filing revisions (e.g. WMP PDF Rev., WMP Excel Workbook Rev., and Annual WMP Rev.). GPI strongly recommends strategically retaining reporting redundancies where they improve one-stop-shop data evaluation by stakeholders, OEIS and the public, while also attempting to reducing other instances of data reporting redundancies that by and large increase workloads and likelihood for filing inconsistencies.

Conclusion

We urge the OEIS to adopt our recommendations herein.

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Respectfully Submitted,

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