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Docket# Data Guidelines

December 23, 2024

Shafi Mohammed, Chief Data Officer
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Comments on Draft Data Guidelines V4.0

Dear Mr. Mohammed:

Southern California Edison Company (SCE) appreciates the opportunity to provide comments on the Draft Data Guidelines v4.0 (draft guidelines) issued by the Office of Energy Infrastructure Safety (Energy Safety) on November 19, 2024. SCE's comments also incorporate feedback from the public workshop hosted by Energy Safety on December 16, 2024.

A COMPREHENSIVE ANALYSIS OF ALL CHANGES ASSOCIATED WITH THE DRAFT GUIDELINES CANNOT BE COMPLETED DUE TO MISSING ELEMENTS ASSOCIATED WITH THE QDR SUBMISSION

Though Energy Safety distributed version 4.0 change logs for both the GIS Spatial QDR and the Non-Spatial Tables 1-15, SCE has not yet received the accompanying Geo-Database (GDB) template, the GIS QDR Spatial Data Status Report template, or the OEIS-QDR-GIS-Data-Schema-Domain-Values Excel file.

Without these supplemental files, SCE is unable to catalog all changes between Data Guidelines version 3.2 and draft version 4.0, or to incorporate these changes into our WiSDM Foundry system for Quarterly Data Report (QDR) reporting. Consistent with the discussion at the December 16 public workshop, SCE agrees that these files are needed alongside the distribution of the red-lined Data Guidelines for utilities to perform their complete change analysis.

THE RESUBMISSION GUIDELINES WOULD RESULT IN ENDLESS RESUBMISSIONS OF QDR DATA

SCE suggests that Energy Safety schedule a stakeholder meeting to discuss how to approach the proposed QDR revision process, as a literal interpretation of this process as currently presented in the draft guidelines would be neither workable nor likely to provide value to users of the quarterly data reports.

For example, Section 2.4 states that when an electrical corporation becomes aware of a need for revisions to previously submitted data, the electrical corporation shall provide the revisions by the

next quarterly submission date.¹ This would create an unworkable expectation for endless data resubmissions, as data included in quarterly reports is updated on a daily basis for multiple reasons, including but not limited to the following:

- Ongoing mapping or data being added into systems of record;
- Incidents under investigation receiving more up-to-date data inputs after the submission deadline;
- Additional reviews, quality control checks, or field verification for newly completed or recently initiated work;
- Continuous changes to our grid, such as the addition or removal of customers and assets;
- Enterprise-wide data cleanup efforts by internal IT and data management teams.

If interpreted literally, the draft guidelines would require submission of revised feature datasets for all previous submissions with every new quarterly submission, as data would inevitably change for the reasons mentioned above. This is further complicated by schema changes that increase the difficulty of managing changes to previously submitted QDRs based on prior formats.

SCE also notes that each QDR submission typically includes upwards of 30 million cells of data across all spatial and non-spatial reports. Reviewing each record to determine the specific cause of every potential change is not possible within the time allotted to produce these reports, nor would it be meaningful in many cases because updated data is often due to operational updates in the normal course as opposed to material issues that merit explanation and discussion.

ALTERNATIVE PROPOSALS TO PROVIDE ACCURATE AND UP-TO-DATE DATA

SCE appreciates Energy Safety’s openness to work towards a solution on the QDR resubmission process via a public workshop and to address the challenges faced by both Energy Safety and the utilities. SCE proposes that Energy Safety consider the following options with regards to a revision of section 2.4 of the Draft Data Guidelines:

- Permit utilities to refer to the Annual Report on Compliance and associated supporting data provided to the Independent Evaluator (IE) as the final source of the utility’s data reporting;
- A Year-To-Date true up in each quarterly submission (for example, Q1 = Jan-Mar, Q2 = Jan-June, Q3 = Jan-Sept, etc.);
- A percent change threshold that would trigger resubmission only when the threshold is exceeded; or
- Set forth a distinction between resubmissions due to material errors or corrections versus resubmissions due to data that is updated per normal operating procedures.

¹ See Energy Safety Data Guidelines Version 3.2 (Jan. 30, 2024), p. 7 (“Revisions to Previously Submitted Data”); Energy Safety Draft Data Guidelines Version 4.0 (Nov. 19, 2024), p. 8.

These options would provide Energy Safety with a single, up-to-date GDB file each quarter with the most current information while eliminating the need for continuous and excessive resubmissions. Such a streamlined process would improve efficiency for both electrical corporations and Energy Safety while maintaining the accuracy and integrity of the data.

DUE DATE FOR THE ANNUAL-WMP TABULAR WILDFIRE MITIGATION DATA FILE

In separate areas of the red-lined draft guidelines, Energy Safety states that the filing is due “3 days prior” and “30 days prior” to a base or update WMP. SCE appreciates Energy Safety clarifying this requirement during that public workshop, and agrees that three days prior to the submission of the base or update WMP is sufficient.

CHANGE ORDER FIELD NOT REMOVED FROM VEGETATION MANAGEMENT PROJECT LINE FEATURE CLASS

Section 3.6.3.6.2 still includes the Change Order field, although all Change Order related data points have been removed from other feature data sets. SCE appreciates Energy Safety recognizing this error will be addressed in the approved version of the guidelines.

SECTION 3.6.2 ASSET POINT CAMERA’S “SUPPORT ASSED ID” FIELD IS INCONSISTENTLY NAMED

As mentioned in the workshop, SCE agrees that this field should be named “Asset ID” to be consistent with the naming convention of this data point in other Feature Data sets.

CONCLUSION

SCE appreciates the opportunity to provide 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, Safety & Infrastructure Policy