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Docket# 2025-07-01 PC

September 3, 2025

Jaime Hastings
Underground Infrastructure Directorate
Office of Energy Infrastructure Safety
715 P Street, 15th Floor
Sacramento, CA 95814

SUBJECT: SCE's Comments Regarding Energy Safety's Request for Comments on Draft Language Prior to Proposed Rulemaking for Geographic Information Systems (GIS)

Dear Ms. Hastings:

Southern California Edison Company appreciates the opportunity to comment on the draft regulatory language for Geographic Information Systems (GIS).

SCE strongly recommends that the Board reconsider the proposed positional accuracy standard and engage with utility stakeholders in workshops to develop a more flexible, cost-effective regulatory framework—one that promotes reasonable improvements in safety and reliability without imposing undue financial burdens on Customers. This should include the incremental benefit associated with the additional costs. Without this type of analysis, information and discussion, these recommendations are being made in a vacuum.

SCE's service territory is over 50,000 square miles. The draft regulatory language mandating a horizontal positional accuracy of 100 mm for field-collected geospatial coordinates poses significant challenges for practical implementation by a utility of this size. These challenges include:

- **High Implementation Costs**: The rule requires significant investment in new technology and training to meet the high accuracy standards (e.g. survey accuracy measurement devices for field personnel)
- **Complexity**: The increased complexity of data collection and management processes will be challenging for utilities to handle (e.g. metadata management)
- **Data Consistency**: Ensuring consistency between old and new data can be challenging, especially if the existing data lacks the required precision.
- **System Upgrades**: Upgrading existing systems to meet the new accuracy standards can be costly and time-consuming.

- **Timeframe for Implementation**: The proposed rulemaking does not provide a specific timeframe for when the regulation should be implemented.

Although precision in geographic information systems is a desirable goal, the requirement for such a high degree of accuracy, especially for all new subsurface installations, does not sufficiently account for the realities of field deployment, nor does it balance the economic ramifications that will inevitably follow. Standard utility practice of installing underground facilities generally does not require survey data. To provide the data at 100 mm accuracy would require hiring surveyors with specialized equipment for every single project, adding considerable expense and time. Achieving this level of precision requires specialized equipment, increased labor training, and meticulous data verification protocols. Many installations occur in environments that are unpredictable—urban congestion, weather disruptions, and limited access all contribute to the difficulty of maintaining such fine tolerances. Even the most advanced GPS and geospatial tools can struggle to deliver consistent accuracy under these conditions, especially for utilities with vast, diverse networks.

Ultimately, the increased costs stemming from this regulatory requirement will be passed on to customers. As a consequence, consumers—many of whom are already sensitive to rising utility costs—will bear the brunt of these decisions. As such, before Energy Safety adopts a regulations that would add considerable costs, a benefit cost analysis should be performed to ensure that the benefits of such a granular requirement justify the additional costs of implementation.

While improvements in geospatial recordkeeping are important, regulations must be crafted with consideration for their real-world feasibility and economic impact. A more practical approach would recognize the diversity of field conditions, the existing technological landscape, and the need to balance precision with affordability. Imposing a universal 100 mm accuracy standard risks creating administrative bottlenecks, stifling innovation, and producing unintended financial consequences for both utilities and the rate-paying public. Accordingly, further workshops should be held to determine a reasonable regulatory framework.

If you have questions, or require additional information, please contact me at matthew.deatherage@sce.com.

Sincerely,

//s//
Matthew Deatherage
Principal Manager, Geomatics