

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Wildfire Safety Division
California Public Utility Commission

**COMMENTS OF THE GREEN POWER INSTITUTE ON THE
WSD'S DRAFT COMPLIANCE OPERATIONAL PROTOCOLS**

January 22, 2021

Gregory Morris, Director
Zoë Harrold, Scientist
The Green Power Institute
a program of the Pacific Institute
2039 Shattuck Ave., Suite 402
Berkeley, CA 94704
ph: (510) 644-2700
fax: (510) 644-1117
gmorris@emf.net

COMMENTS OF THE GREEN POWER INSTITUTE ON THE WSD'S DRAFT COMPLIANCE OPERATIONAL PROTOCOLS

Pursuant to the January 8, 2020, WSD Resolution conditionally approving the 2020 Bear Valley Electric Service Wildfire Mitigation Plan, the Green Power Institute, the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security (GPI), provides these *Comments of the Green Power Institute on Draft Resolution WSD-013*.

GPI generally supports the WSD's Draft Guidance for Compliance Operational Protocols. Establishing a defined and universal annual compliance cycle, including reporting deadlines, content expectations, formatting, and structure will improve WMP quarterly reporting and report review going forward. GPI provides the following factual and technical recommendations on the Draft Guidance:

- 1. Clarify if the proposed quarterly report includes quarterly reports established in WSD-011 and if the Draft Guidance, along with WSD-012, supplants previously established Class B and C WMP deficiency reporting requirements.**

The preliminary WMP review and compliance efforts in 2020 initiated quarterly reporting to provide WMP updates as well as address Class B and C deficiencies established in WSD-002 through WSD-010. The resultant quarterly reports were hundreds of pages long for each LSE. WSD-011 implemented changes to improve and streamline WMP annual and quarterly reporting, including adopting WSAB WMP Recommendations to: "Strike a balance between data submission requirements, quarterly reporting and program implementation (WSD-011, p. 4)." These changes included:

The Performance Metrics Data Template (Attachment 2.3) is an Excel spreadsheet for reporting non-spatial data, which the WSD will require on a quarterly basis to align with GIS data submissions (WSD-011, p. 6).

And:

The quarterly report structure is not identical to the WMP data requirements. Therefore, for 2021, all annual data requirements are moved into the quarterly report (spatial and non-spatial) format, and data requirements are removed from the annual WMP. This reporting schedule replaces that adopted in Resolution WSD-002. 2020 Class B deficiencies and conditions requiring ongoing reporting are still required and will be submitted alongside the new quarterly data submissions according to the schedule adopted herein, rather than according to the schedule adopted in Resolution WSD-002. The insights generated from quarterly reports should reduce analysis time during the annual WMP review, leading to a faster and higher quality review process (WSD-011, p. 8).

And:

Finally, the Commission acknowledges comments from the IOUs regarding the volume and scope of quarterly data reporting requirements. The WSD will continue to work with stakeholders to ensure these requirements can be met. No changes are made to the data reporting requirements at this time (WSD-011, p. 12).

The Draft Guidance should clarify if: (1) The Quarterly Initiative Update or Quarterly Data Report includes the “Performance Metrics Data Template” established in WSD-011; (2) The proposed quarterly reports in the present Draft Guidance and the Defect Categories established in WSD-012 supplant the previous established “Class B” and “Class C” deficiency structure and associated quarterly and annual reporting/corrective requirements, respectively; and (3) Whether EC defect correction responses are filed separately from the quarterly and annual compliance reports, within quarterly/annual compliance reports, or either depending on defect category, the accompanying correction timeline, and WSD discretion.

2. Clarify that content in the Quarterly Advice Letter (QAL) and Annual Report on Compliance (ARC) narration should follow the structure/order of the WMP.

The draft guidance should establish that narrative content in the QAL and ARC should follow the updated organizational structure of the WMP. Presenting initiative updates in order of the WMP filings will facilitate cross comparison between filings as well as ECs.

File all compliance reporting submissions filed under the hierarchical “Compliance” folder in KiteWorks.

It is not clear as to why some quarterly compliance report elements, namely the QAL and the QDR are not filed in the same second hierarchical “4 Compliance” folder along with the ARC, and QIU. The quarterly compliance narration in QAL, and the data filings in QDR and QIU should complement each other, and to our understanding are meant to be evaluated together. The narrations that accompany Electric Corporation’s (EC) quantitative reports in other CPUC filings provide important context underlying the data. GPI suggests filing all quarterly compliance reports for a given EC in one folder for each quarter under the second hierarchical “Compliance” folder. That is filing the QAL, QIU and QDR in one [Quarter] folder under [EC] > 2 Compliance > QR > [YYYYQ#]. Alternatively, filing QAL and QDR in separate, third level “QAL” and “QDR” folders within the second “Compliance” hierarchical folder is also possible.

The Draft Guidance also uses “XGE” to denote EC folder name. It should clarify if the quarterly reporting and filing requirements only apply to the IOUs (i.e. PGE, SCE, SDGE), or to Small Multijurisdictional Utilities (SMJUs) as well (i.e. Liberty, BVES, PacifiCorps). The notation “XGE” should be updated to “[EC]” or “[Utility]” if all utilities required to file WMPs are included in the guidance’s quarterly reporting and file upload requirements.

3. The Quarterly Initiative Update (QUI) Excel filing should minimize qualitative inputs and ensure that they do not overlap with the Quarterly Advice Letter (QAL) content.

The QAL is defined as the narration component of the quarterly reports and includes “Status updates for the prior calendar quarter of all initiatives laid out in the EC’s Wildfire Mitigation Plan (Draft Guidance, p. 6).” The QIU includes filing data in an excel spreadsheet and audit documentation. However, the QIU data component also includes qualitative content, stating: “Status updates for all initiatives (both quantitative and qualitative) laid out in the EC’s Wildfire Mitigation Plan for the prior calendar quarter; supplements EC QAL information in Excel format (Draft Guidance, p. 7).” Under QIU

Format (1) these qualitative updates include: “QX – Qualitative Progress (for designated quarter, cumulative)” and: “Corrective Actions for Behind Schedule/Off Track Initiatives (Draft Guidance, p. 7-8).”

The QAL and QIU should complement each other and should have limited content overlap, especially in terms of more extensive qualitative or descriptive narrations. GPI recommends distinguishing between QAL narration content expectations and QIU qualitative content. The QIU excel workbooks should have limited narration components and should primarily reference the QAL narration. Namely, detail regarding of EC’s QIU “Qualitative progress” and “Correction actions” descriptions should be included in the QAL, with only limited/bulleted explanations or semi-quantitative (e.g. rubric-based, or estimated percent completion) entries in the QIU excel filing. This will reduce content duplication, reduce stakeholder and WSD review time, and will establish the quarterly report filing (i.e. the QAL, QIU, and QDR) as a “packet” intended to be reviewed together.

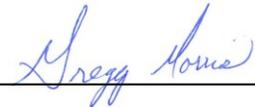
The Draft Guidance should also clarify if and where the quarterly “Performance Metrics Data Template” established in WSD-011 fits into the proposed quarterly reporting structure.

Conclusions

The GPI urges the Commission to adopt our recommendations.

Dated January 22, 2021

Respectfully Submitted,



Gregory Morris, Director
The Green Power Institute
a program of the Pacific Institute
2039 Shattuck Ave., Suite 402
Berkeley, CA 94704
ph: (510) 644-2700
e-mail: gmorris@emf.net