

PUBLIC ADVOCATES OFFICE

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



To: **Caroline Thomas Jacobs, Director**
Wildfire Safety Division
California Public Utilities Commission

**COMMENTS OF THE PUBLIC ADVOCATES OFFICE
ON SOUTHERN CALIFORNIA EDISON COMPANY'S
SEPTEMBER 2020 CHANGE ORDERS REPORT**

HENRY BURTON
Program and Project Supervisor

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Telephone: (415) 696-7311
Email: Henry.Burton@cpuc.ca.gov

DIANA L. LEE
Deputy Chief Counsel

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Telephone: (415) 703-4342
Email: Diana.Lee@cpuc.ca.gov

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I. INTRODUCTION

Pursuant to Resolution WSD-002,¹ the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these comments on Southern California Edison Company's (SCE) September 2020 Change Orders Report for SCE's 2020 Wildfire Mitigation Plan (WMP).

In these comments, Cal Advocates makes the following recommendations:

- The Wildfire Safety Division (WSD) should require SCE to provide more detailed information in its 2021 WMP update on the workload for its de-energization Incident Management Team.
- SCE should assess its de-energization related workload annually and provide that information in its annual WMP submissions.

II. BACKGROUND

Resolution WSD-002, the Guidance Resolution on 2020 Wildfire Mitigation Plans, directs electrical corporations² to submit "change orders" three and six months after the effective date of Resolution WSD-002,³ if a utility needs to modify any aspect of its approved WMP.⁴ The purpose of the change order process is to ensure that each utility "continues to follow the most effective and efficient approach to mitigate its wildfire risk."⁵

SCE submitted its first Change Orders Report on September 11, 2020. WSD-002 provides for stakeholders to submit comments to the WSD within 15 days.⁶

¹ *Resolution WSD-002 Guidance Resolution on 2020 Wildfire Mitigation Plans Pursuant to Public Utilities Code Section 8386*, June 11, 2020, (Resolution WSD-002), pp. 33-35.

² Many of the Public Utilities Code requirements relating to wildfires apply to "electrical corporations." See e.g., Public Utilities Code Section 8386. These comments use the more commonly used term "utilities" as well as the phrase "electrical corporations" to refer to the entities that must comply with the wildfire safety provisions of the Public Utilities Code.

³ The California Public Utilities Commission adopted Resolution WSD-002 on June 11, 2020 with immediate effect.

⁴ Resolution WSD-002, pp. 32-35.

⁵ Resolution WSD-002, p. 32.

⁶ Resolution WSD-002, pp. 34-35.

III. DISCUSSION

A. **The WSD should require SCE to provide more detailed information on the off-season and long-term workload for its Wildfire Infrastructure Protection Team.**

Section C of SCE’s First Change Orders Report addresses staffing needs related to de-energization events. SCE proposes to create a dedicated Incident Management Team (IMT) to manage de-energization events.⁷ This IMT would include 18 full-time positions and would form part of SCE’s Wildfire Infrastructure Protection Team.⁸ SCE states that establishing a dedicated IMT for de-energization events would relieve pressure on other parts of the company, because the current practice is to draw staff from other units on a rotating basis for de-energization IMTs.⁹

Cal Advocates does not oppose this proposed Change Order. Cal Advocates met with SCE to discuss the issue and appreciates the need for sufficient and skilled personnel to manage de-energization events. However, SCE’s Change Order raises two concerns.

First, SCE’s Change Order does not adequately describe the expected workload for the 18 new IMT positions outside of the peak wildfire season. The Change Order focuses on incident management activities that occur during periods of “extreme weather and other high-fire threat conditions,” including “coordination, consistency, and execution of [Public Safety Power Shutoff] events.”¹⁰ These activities are most likely to occur during the months of August through December.

The WSD should direct SCE to provide a thorough description of the off-season workload for the de-energization IMT and the Wildfire Infrastructure Protection Team more generally. SCE should submit this information as part of its 2021 WMP update. In particular, SCE should address (a) how it will deploy all of its staff on the Wildfire Infrastructure Protection Team efficiently throughout the year, (b) how the de-

⁷ SCE First Change Orders Report, pp. 9-10.

⁸ SCE First Change Orders Report, pp. 9-10.

⁹ SCE First Change Orders Report, pp. 9-10.

¹⁰ SCE First Change Orders Report, p. 9.

energization IMT's preparatory work in the off-season will lead to strategically targeted and better executed de-energization events, and (c) to what extent members of the de-energization IMT can contribute to other wildfire mitigation efforts during the off-season. The WSD should direct SCE to provide project management charts (such as Gantt charts) that identify activities and objectives by month.

Second, SCE's Change Order does not address the long-run outlook for de-energization related staffing needs. De-energization is just one strategy to reduce wildfire risk and is a measure of last resort. Cal Advocates expects that SCE will reduce its reliance on de-energization as it makes progress on system hardening and vegetation management over the next several years, as SCE indicates in its 2020 WMP.¹¹ In the long run, de-energization events should be small and rare and thus should not necessitate 18 full-time positions.

The WSD should direct SCE, as well as other electric utilities, to provide an assessment of staffing needs related to de-energization in each annual WMP submission. The assessment of staffing needs should address the seasonal variation in workload, as discussed above. Based on our discussion with SCE, Cal Advocates understands that SCE intends to conduct such an assessment regularly.

The WSD should expect that staffing needs related to de-energization will gradually decline. By the time of the 2023 filing of a new WMP, if a utility's de-

¹¹ SCE's 2020 Wildfire Mitigation Plan forecasts decreases in the scope, frequency, and duration of de-energization events over the next 10 years. See Table 20 of SCE's 2020 WMP and Section 4.4: "Directional Vision for Necessity of PSPS," p. 4-17:

Setting aside variability in weather conditions, SCE anticipates de-energization events to decrease in coming years. However, PSPS events will still be required in some cases for the safety of customers and communities. SCE is targeting ignition risk mitigation efforts on circuits most impacted by PSPS in 2018 and 2019. Continuous improvement in operational practices (e.g., optimizing circuit-specific activation and de-energization thresholds), expanded grid hardening activities (e.g., targeted installation of covered conductor and additional automated sectionalizing devices), and enhanced situational awareness capabilities through expansion of SCE's network of weather stations will also facilitate reducing PSPS events over time.

energization staffing requirements are not declining each year, the WSD should require the utility to explain why.

IV. CONCLUSION

Cal Advocates respectfully requests that the Wildfire Safety Division adopted the recommendations discussed herein.

Respectfully submitted,

/s/ Diana L. Lee

Diana L. Lee
Deputy Chief Counsel
Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Telephone: (415) 703-4342
E-mail: Diana.Lee@cpuc.ca.gov

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