

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

Wildfire Safety Division  
California Public Utilities Commission

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**SMALL BUSINESS UTILITY ADVOCATES' COMMENTS ON SOUTHERN  
CALIFORNIA EDISON'S FIRST CHANGE ORDERS REPORT**

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Director Caroline Thomas Jacobs  
Wildfire Safety Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102

Via e-mail: caroline.thomasjacobs@cpuc.ca.gov and R.18-10-007 service list

Re: Comments on Southern California Edison's First Change Orders Report

Dear Director Jacobs,

Pursuant to the Wildfire Safety Division's (Division) Resolution WSD-002 (Resolution), Small Business Utility Advocates (SBUA) submits the following comments on Southern California Edison's (SCE) First Change Orders Report (Report) dated September 11, 2020. According to WSD-002, Reports have to provide information on numerous topics including a detailed description of the proposed change, how the proposed change improve the effectiveness of the initiative, and what outcomes the proposed change will deliver.<sup>1</sup> SCE's Report proposes changes to initiatives IN-1.1 and IN-2,<sup>2</sup> initiative DEP-3,<sup>3</sup> initiative OP-2,<sup>4</sup> and a new initiative to increase cooperation with suppression agencies.<sup>5</sup>

As further detailed below, SBUA respectfully makes the following recommendations:

- Prior to approving DEP-3, the Division should require SCE to provide additional information about how it plans to spend the \$4.1 million and how the additional funding will allow SCE to meet customer needs that are currently unmet, including small commercial customers.
- Prior to approving OP-2, the Division should require SCE to explain how the hiring of 18 fulltime employees dedicated to overseeing PSPS activities is necessary and prudent throughout the year given that PSPS events are more likely during certain months of the year than others.

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<sup>1</sup> Res. WSD-002, p. 34.

<sup>2</sup> This change proposes to increase the scale of distribution and transmission inspection. *See* Report, p. 3.

<sup>3</sup> This change proposes to end the statewide outreach campaign and shift the remaining balance of the statewide campaign to the local outreach campaign. *See* Report, pp. 6-7.

<sup>4</sup> This change proposes to hire additional personnel to help manage PSPS events. *See* Report, p. 6.

<sup>5</sup> This change proposes to fund the lease costs of a helitanker during the fourth quarter of 2020 that Orange County Fire Authority will operate for fire suppression purposes. *See* SCE Report; *see also* Letter from Carla Peterman, *WMP Change Order Update: SCE to Enter into Agreement with Orange County Fire Authority to Lease Helitanker Aircraft for Additional Fire Suppression Capability* (Sept. 16, 2020).

- Before approving SCE’s new cooperative initiative with Orange County Fire Authority, the Division should provide guidance on the procedure utilities must follow prior to committing substantial funds to new initiatives.

### **I. Changes to Initiative IN-1.1 and IN-1.2**

SBUA does not oppose changes to initiatives IN-1.1 and IN-1.2. Increasing inspections of distribution lines and equipment in high fire risk areas seems reasonable.

### **II. Changes to Initiative DEP-3**

SCE proposes to end its statewide education campaign and shift the \$4.1 million remaining balance for this program to its local outreach campaign, noting that its early analysis indicates local campaigns are more effective at increasing customer awareness of SCE’s wildfire efforts.<sup>6</sup> According to SCE, focusing on the local marketing campaign will allow the company to “be more effective in its outreach to customers and communities for wildfire and PSPS education and preparedness.”<sup>7</sup> The Report mentions that SCE currently measures effectiveness of the local campaign through surveys and that results are “aggregated on a quarterly and annual basis.”<sup>8</sup>

SBUA supports the decision to shift away from statewide campaigns that rely on mass media outreach and focus on local outreach.<sup>9</sup> However, SCE needs to provide additional information about how it plans to spend the \$4.1 million and how the additional funding will allow SCE to meet customer needs, including small commercial customers, that are currently unmet. This would align with the Resolution’s requirement that proposed changes need to provide a *detailed description* of the change and how the change will improve the effectiveness of the initiative.<sup>10</sup> A general description indicating that SCE will further fund the local outreach programs does not meet these requirements.

The Division should require SCE to, at a minimum, provide information on which programs of the local outreach campaign will receive additional funding, how much each program will receive, which customer classes will the programs target, and how this additional funding will help the programs achieve previously unattainable goals. SCE should provide its quarterly and annual data on the effectiveness of the local campaigns so that the Division and stakeholders can understand what the current gaps are and how the additional funding will help address them. These additional funds should be utilized for targeted outreach programs that focus on specific customer segments, including small commercial customers, whose needs are not being met and SCE should specify how it will do so.

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<sup>6</sup> Report, p. 7.

<sup>7</sup> Report, p. 7.

<sup>8</sup> Report, p. 8.

<sup>9</sup> SBUA has previously commented on the need to focus on local, targeted outreach activities. *See e.g.* Rulemaking 18-10-007, *Reply Comments of Small Business Utility Advocates in Response to the Administrative Law Judge's Ruling Requesting Comments on Workshops in Phase 2*, p.2 (Nov.18, 2019).

<sup>10</sup> Res. WSD-002, p. 34.

### **III. Changes to initiative OP-2**

SCE proposes to hire a total of 18 additional fulltime employees who will serve as the dedicated team overseeing PSPS events.<sup>11</sup> According to SCE, PSPS activities are currently overseen by employees across various operating units.<sup>12</sup>

Hiring a dedicated staff to oversee PSPS activities sounds reasonable but the need to hire 18 fulltime employees is unclear given that PSPS events are more likely during certain months of the year than others. The Division should require SCE to address this concern before approving the change.

### **IV. New cooperation initiative.**

SCE is negotiating an agreement with the Orange County Fire Authority (OCFA) to cover the fixed costs of leasing a helitanker aircraft for the fourth quarter of 2020, to assist with wildfire suppression in SCE's service area.<sup>13</sup> SCE estimates these costs at between \$2.1 and \$2.5 million.<sup>14</sup>

SBUA does not question the value a helitanker adds to fire suppression particularly given that 2020 has experienced several catastrophic fires throughout the state and that OCFA recently retired two helicopters due to safety concerns, thereby reducing its fire suppression capability by more than 50%.<sup>15</sup> However, the Division should provide guidance on the procedure utilities should follow prior to committing substantial funds for new cooperation initiatives not included in that utility's approved Wildfire Mitigation Plan (WMP). One of the purposes of the WMPs is to promote transparency and provide the public an opportunity to vet initiatives prior to a utility spending substantial funds, which it will subsequently seek to recover from ratepayers.

SBUA appreciates the opportunity to comment on this matter.

Sincerely,

/s/ 

Ivan Jimenez  
Regulatory Attorney  
Small Business Utility Advocates

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<sup>11</sup> Report, p. 10.

<sup>12</sup> Report, p. 10.

<sup>13</sup> Report, pp. 11-12.

<sup>14</sup> Report, p. 12.

<sup>15</sup> Report, p. 12.