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SUBJECT: Southern California Edison Company's Comments on Wildfire Safety Division's Draft Compliance Operational Protocols

Director Thomas Jacobs,

Southern California Edison Company (SCE) hereby submits its comments on the Wildfire Safety Division's (WSD) Draft Compliance Operational Protocols (Draft Compliance Protocols) issued on January 8, 2020.

INTRODUCTION

SCE appreciates the WSD's Draft Compliance Protocols recommendations to support its compliance reviews of electrical corporations' (EC) Wildfire Mitigation Plans (WMPs) and is supportive of consistent reporting formats and timelines. However, SCE has concerns with several recommendations including the new Quarterly Initiative Updates (QIU) report that duplicates information in other quarterly reports, newly proposed requirements not contemplated in statutes, new annual compliance reporting requirements that are duplicative of requirements in the Changes to WMP Guidelines attached to Resolution WSD-011, and terms that are not defined. SCE is also concerned with the lack of utility and stakeholder involvement in imposing new requirements and criteria that have significant impact on utility operations and associated administrative costs and recommends a collaborative process to streamline reporting. As such, SCE respectfully requests workshops with all stakeholders to discuss the role of the QIU and its duplicative requirements before any of these requirements are adopted. SCE also proposes other process changes to further streamline the Quarterly Data Report (QDR) requirements. Below, SCE describes the recommended changes it supports, and those that require modification.

THE INCREASING DATA AND INFORMATION REQUESTS NEED TO BE RATIONALIZED TO STREAMLINE REPORTING AND REVIEW, AND MAINTAIN FOCUS ON WILDFIRE RISK MITIGATION

SCE proposes collaborating with the WSD and stakeholders to rationalize the various reporting requirements including the Quarterly Advice Letter (QAL), the QDR, and the now potentially new QIU to identify data elements that are not repetitive across reports, are conducive to annual updates, can be reasonably produced at quarter end, and are

reasonably relevant to WMP review and approval. SCE agrees with streamlining and believes pertinent and responsive data is an integral part of making the WMP review and compliance processes better. SCE proposes two tracks of workshops, one track to rationalize the QIU with the other non-spatial data and reporting requirements and the other track to work through the policy and technical details of the non-spatial and Geographic Information Systems (GIS) spatial data. As described in the sections below, the existing and proposed reporting requirements contain duplicative information, include data/information that is not relevant for wildfire risk mitigation and/or WMP compliance, and are a significant burden on utility employees that affects their ability to implement wildfire mitigation initiatives. In Resolution WSD-011, WSD acknowledged concerns about the volume and scope of quarterly reporting requirements and indicated that it would work with stakeholders to ensure these requirements can be met.¹ There are several instances of duplicative data across the various reporting requirements, including the GIS spatial data. For example, in the QDR spatial data requirements, the Initiative Asset Log table includes the list of assets associated with each initiative. But the table also includes derived master data attributes for each listed asset, i.e., attributes such as substation, circuit, circuit type, and circuit length. These derived master data attributes for each asset are also included on the respective Asset Point and Asset Line tables. Similarly, and as explained further below, the proposed QIU report contains requirements that are duplicative of information in the QDR and the QAL.

SCE supports the WSD's focus on data, but the requirements should be rationalized to streamline reporting and review, and maintain focus on wildfire risk mitigation. SCE recommends the WSD support its recommendations below to pause the QIU, amongst other suggestions, and establish a process with stakeholders to develop a better and more streamlined reporting process.

BEFORE THE QUARTERLY INITIATIVE REPORT IS ADOPTED THE WSD SHOULD RATIONALIZE THE REQUIREMENTS IN A SERIES OF WORKSHOPS

The WSD proposes that ECs set up quarterly targets for its wildfire initiatives and report progress made each quarter. According to the Wednesday, January 13, 2021 WSD clarification meeting with the ECs, the QIU report is intended to report plans and progress of utility initiatives on a quarterly basis. Specifically, the QIU template, attached to the Draft Compliance Protocols letter, includes fields for wildfire mitigation initiatives,² quarterly targets for those initiatives and progress of the quarterly targets. As further explained below, the QIU report does not seem necessary, duplicates information in other reports, is inconsistent with statutory law and Commission Resolutions, and should not be adopted until rationalized with the other reports in collaboration with ECs and stakeholders. SCE recommends 2-3 workshops, 2-4 hours

¹ Resolution WSD-011, p. 16.

² An initiative is a commitment pertaining to a wildfire risk mitigation activity in an EC's WMP used to measure performance and compliance. See Resolution WSD-012, Attachment 1, p. 3, fn. 1.

long beginning after WMP approval and scheduled over a 1-2 month period. Whether the outcome of these workshops is a new QIU report, a new initiative report with a different cadence, modifications to existing reports, and/or other changes, they could then be adopted and implemented in the third quarter of 2021 or beginning in 2022. Any potential future new report could follow a similar process prior to adoption. Below, SCE describes its concerns with the QIU report.

The ECs have historically neither been required to, nor established quarterly goals for their wildfire initiatives as wildfire mitigation planning is conducted on an annual basis. Requiring utilities to establish quarterly targets for their wildfire initiatives is also inconsistent with Resolutions WSD-011 and WSD-012 and Public Utilities Code (PUC) § 8386.3(c)(1). There is no wildfire initiative quarterly target requirement in WSD-011, which sets forth, amongst other items, the 2021 WMP Update requirements, or WSD-012, which adopted the wildfire mitigation plan compliance process. The compliance period for WMPs is annual not quarterly. PUC § 8386.3(c)(1) explains how the Annual Report on Compliance (ARC) is to address compliance with the plan during the prior calendar year. Resolution WSD-012 explains that WSD will assess compliance annually.³ In the Draft Compliance Protocols, the WSD proposes that the annual compliance period be January 1 through December 31 for each calendar year.⁴ Requiring ECs to establish quarterly targets thus runs counter to EC wildfire mitigation planning, Resolutions WSD-011 and WSD-012, PUC § 8386.3(c)(1), and language in the Draft Compliance Protocols. Further, quarterly goals could be unduly restrictive and limit the operational intra-year flexibility of an EC to deploy resources in a manner best aligned with achieving annual goals. As such, quarterly targets are an unnecessary, and potentially deleterious, requirement that do not contribute any incremental benefit to wildfire risk mitigation.

Moreover, ECs are already required to submit other extensive reports on a quarterly basis. These include the Quarterly Advice Letter (QAL) and the Quarterly Data Report (QDR) which includes the non-spatial data (Tables 1-12) and the GIS spatial data. These reports require information that is duplicated in the QIU report. For example, Initiative spatial data includes the same progress data, i.e., recorded units of work, for the major wildfire mitigation initiatives. Table 12 of the non-spatial data also includes progress data for each wildfire initiative. While not in the same format as the QIU, the non-spatial data template could be modified. Separately, the QAL requires ECs to provide details of the implementation of its WMP. These advice letters thus include numerical, descriptive, and color-coded status of each wildfire initiative on a quarterly basis. Again, not in the same format as the QIU, but all the necessary progress data and more is included. For example, SCE's advice letters include further description for wildfire initiatives that are considered "Behind Plan, At-Risk of Not Meeting Year-end Goal" and "Behind Plan, Likely to Meet Year-end Goal" including actions to improve performance. This information does not need to be repeated in the QIU report. Also, information included in the Q4 QIU report will be captured in the ARC. SCE supports the

³ Resolution WSD-012 at p. 7.

⁴ Draft Compliance Protocols at p. 1

WSD's intent of establishing consistent reporting to streamline communications; however, the QIU is largely duplicative of existing reports.

For all of the reasons stated above, SCE concludes that prior to adopting the QIU, the WSD should rationalize its requirements with the other reports in workshops beginning after WMP approval.

QUARTERLY DATA REPORT

SCE reiterates its Comments on WSD's August 11-12, 2020 Workshop Presentations and Associated Staff Proposals and its Comments on Draft Resolution WSD-011 to establish policy and technical working groups for the QDR and its concerns with the burdensome quarterly requirements that should be rationalized to determine feasible submissions that directly correlate to reducing wildfire risk and PSPS impacts. To initiate this process, SCE recommends separate workshops to begin after WMP approval to establish the structure, process, scope and cadence for these working groups. As SCE has expressed, we support streamlining and believe pertinent and responsive data is an integral part of making the WMP review process better. Given that the QDR requirements are in their early stages, policy and technical working groups should be established and be a permanent part of the overall WMP process for some time.

SCE also seeks clarity on when Class B deficiencies will be resolved and removed from quarterly reporting requirements. Also, and as explained in previous comments, based on the current level of effort involved with manual data ingestion, transformation, additional data derivation, consolidation and validation activities in support of WSD data submissions, 30 days to submit the QDR after the end of each quarter is insufficient at this time. SCE recommends the QDR be due 45-60 days after the end of the reporting period until systems are more fully automated.

ANNUAL COMPLIANCE REPORTS

The Draft Compliance Protocols include new requirements for the ARC that are already covered in the 2021 WMP Guidelines or should be removed for other reasons, and requirements that need further definition. First, SCE interprets the risk reduction intent of implementing approved wildfire mitigation initiatives as assessing its annual wildfire initiative goals against the annual wildfire initiative results taking into consideration our stated risk order for the wildfire initiatives. Second, SCE interprets including in its ARC a list of operational changes⁵ to mean those changes that were submitted in the Change Orders Reports. SCE requests the WSD affirm these interpretations or clarify what it means by "risk reduction intent" (and how this is supposed to be calculated) and "operational changes."

SCE is also confused regarding the ARC requirement to provide forecast versus actual spending and its relevance to WMP compliance. Though the WMP requires cost information and the WSD has the compliance responsibility to ensure ECs not divert

⁵ Draft Compliance Protocols at p. 5.

revenues authorized to implement the plan to any activities or investments outside of the plan, the CPUC has clearly established that the WMP is not a cost review or cost recovery mechanism.⁶ WMP compliance mostly relates to utilities implementing the *scope* of work approved in their WMPs. Recorded costs are also already required to be provided in the 2021 WMP Update and the QDR. As such, this requirement should be removed. Additional cost information is an unnecessary additional requirement that does not add any additional benefit in wildfire risk mitigation, and the WSD can view this information in both the 2021 WMP Update and the QDR.

Finally, a description of whether the implementation of WMP initiatives changed the threshold(s) for triggering a PSPS event and/or reduced the frequency, scale, scope and duration of PSPS events is already covered in Chapter 8 of the 2021 WMP Guidelines. The 2021 WMP Guidelines includes several changes from the guidelines used for the 2020 WMP. Amongst other changes, the WSD created a separate chapter for PSPS data and information. The PSPS chapter includes several requirements including, but not limited to, descriptions of protocols and thresholds for PSPS implementation and a quantitative description of how the circuits and numbers of customers that the utility expects will be impacted by any necessary PSPS events is expected to evolve over time. As such, the 2021 WMP Update will describe changes to frequency, scale, scope and duration of PSPS events which transpired in 2020 and projections for 2021. SCE will also describe prospective changes to thresholds as a result of its system hardening. Given that the requested PSPS information will be included in the 2021 WMP Update, it should be eliminated from the ARC.

RESPONSE AND CORRECTIVE ACTIONS TIMELINE

Resolution WSD-012 and the attached WMP Compliance Process provide only a high-level discussion of WSD's annual compliance process. SCE was hoping that WSD's Draft Operational Protocols would provide the details on how WSD would implement and operationalize its annual compliance oversight responsibilities so that utilities can have a better understanding of the expected process and prepare to support accordingly. However, the Draft Compliance Protocols are more focused on how electrical corporations are to submit various reports than how WSD will implement and operationalize their compliance oversight responsibilities. WSD's Draft Operational Protocols should include a series of workshops with ECs and stakeholders to develop the necessary details. SCE further describes its recommendations below.

A "WMP Defect" Should be Defined through Workshops with Electric Utilities and Stakeholders

Resolution WSD-012 sets forth accelerated remediation timeframes for "WMP defects" compared to General Order (GO) 95 "defects." However, WSD has not defined what it classifies as a "WMP defect." GO 95 already has different remediation timeframes for "defects" in Tier 2 and 3 High Fire Threat Districts (HFTD) compared to those in non-

⁶ D.19-05-036

HFTD areas.⁷ Thus, it is unclear what constitutes a “WMP defect” and how that is different from a GO 95 “defect.” Moreover, WSD’s primary purpose is to ensure electrical utilities are taking effective actions to reduce utility-related *wildfire risk*. As such, the determination of what is classified as a “WMP defect” should take into consideration the defect’s potential to ignite a catastrophic wildfire. For example, vegetation touching a down guy wire above the insulator (with all other vegetation clearances in compliance) should not be treated as a “WMP defect” simply because the structure is in a HFTD area. This defect does not pose an ignition risk and thus should be classified as a GO 95 “defect,” subject to the GO 95, Rule 18 remediation timeframes. Another commonsense example is a broken or missing High Voltage sign. A broken or missing High Voltage sign does not pose any potential ignition risk and should not be considered a “WMP defect” in any situation. Accelerating the remediation time frame, as required for “WMP defects,” will require utility resources to de-prioritize other higher-priority work and create a less efficient remediation process. Identifying defects that do not pose an ignition risk as a “WMP defect” would create greater wildfire risk to utility facilities and the communities utilities’ serve. It is critically important to not over-categorize defects as “WMP defects” simply because the defect is located in a HFRA because this could have substantial implications on utility operations and costs including deviating resources from higher priority work from safety and reliability perspectives to meet compliance requirements. SCE recommends the WSD hold workshops with the utilities and stakeholders to determine the list of “WMP defects.” Definition of “WMP defects” and corresponding remediation timeframes that will constitute as regulatory requirements should be developed through thoughtful discussion and analysis among stakeholders.⁸ WSD should provide its proposed list of “WMP defects” that pose an ignition risk requiring remediation sooner than a GO 95 “defect” with supporting data and analyses in advance of the workshops. WSD’s Draft Operational Protocols should thus include a series of workshops to develop the criteria WSD should use to classify “WMP defects” as compared to a GO 95 “defect” in Tier 2 and 3 and inform of the date it will provide its proposed list and supporting data.

“WMP Defects” considered to be “Severe,” “Moderate” and “Minor” Should Also be Defined in Workshops with Electric Utilities and Stakeholders

⁷ GO 95, Rule 18 A.(2)a(ii) states for Level 2 corrective actions “Time period for correction to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for nonconformances that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for nonconformances that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for nonconformances that compromise worker safety; and (4) 59 months for all other Level 2 nonconformances.”

⁸ SCE recognizes that time is of the essence and supports an efficient process. However, technical analyses and reviews along with proper stakeholder vetting can take significant time. For example, the process to revise GO 95 Rule 18 specifying maximum repair time frames for GO 95 nonconformances identified in Tier 3 and Tier 2 of the (then) new High Fire Threat District was the culmination of nearly 10 years of public workshops and technical meetings. This process also resulted in the adoption of many changes to other GO 95 rules, GO 165, and GO 166.

WSD has also not defined what types of “WMP defects” will fall within each of the three remediation categories. While WSD may not be able to provide an exhaustive list of all potential defects by category, SCE recommends WSD collaborate with utilities and stakeholders to define these in the workshops proposed above. It would be helpful to utilities and stakeholders for the WSD to provide its initial criteria for what types of defects it believes fall under each category prior to the workshops. WSD’s Draft Operational Protocols should thus also explain how the criteria for what types of “WMP defects” will fall within each of its categories will be developed through workshops.

WSD’s Operational Protocols should provide details about WSD’s Reporting of Defects

WSD has stated that they will be publicly posting a monthly report regarding its audit findings and field inspection reports. However, WSD has not provided any details about what will be contained in the report and the process that ECs can use if they dispute the findings reported by WSD. These details should be included in WSD’s Draft Operational Protocols.

Responses to WSD should be based on business days, not calendar days

In its Draft Compliance Protocols, WSD includes multiple correction actions timelines with specific turnaround times. For example, the WSD states “If the EC does not agree with the categorization of the severe defect WSD has identified, the EC shall provide the WSD Inspector with written explanation within 2 calendar days.”⁹ While SCE understands that it is important to resolve potential defects in a timely manner and “severe” defects immediately, the response times should be in business days as opposed to calendar days. Using the example above, requiring a written response in 2 calendar days will require some responses to be due on weekends and holidays. For example, if WSD informs the EC on a Friday of a possible “severe” defect, the EC would have to respond back with its objections no later than Sunday. SCE proposes that the time periods to respond back to WSD in various situations be in business days instead of calendar days. Also, while certain communication for “severe” defects needs to be immediate, written explanations of what was done to cure a “severe” defect should be given at least 5 business days. A simple phone call could inform of the correction with a written explanation 5 business days later.

CONCLUSION

SCE appreciates the opportunity to submit its comments on the Draft Compliance Protocols.

If you have any questions, or require additional information, please contact me at carla.peterman@sce.com.

⁹ Draft Operational Protocols, p.10

Sincerely,

//s//

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