

June 30, 2020

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

SUBJECT: Southern California Edison's Comments on the Wildfire Safety Division's Proposed Strategic Roadmap

Dear Ms. Thomas Jacobs,

Southern California Edison (SCE) hereby submits its comments in response to the Wildfire Safety Division's (WSD) May 11, 2020 Proposed Strategic Roadmap for reducing utility-related wildfire risk.

OVERVIEW

SCE appreciates the opportunity to comment on the WSD Roadmap. SCE generally agrees with the essential elements of wildfire management and oversight that WSD outlines including

- the four principles to guide utility wildfire mitigation strategy: effective collaboration, local perspective, long-term resilience and risk-informed data supported decisions;
- the four priority actions: utility Wildfire Mitigation Plans (WMPs), utility metric reporting, detailed risk assessment, and data and analytics strategy; and
- the four areas where collaborative efforts among the WSD, the utilities and other agencies are critical first steps: governance and coordination, culture and behavior, applied science, tech & data, and workforce development.

Moving forward, it is essential that the roles and responsibilities of various agencies are clear and aligned to ensure that wildfire mitigation policy and cost recovery associated with wildfire activities are consistent. The WMP requirements must be clear, achievable and practical. In addition, the WMP process, oversight and approval must be reasonable, predictable and timely. Based on these broad objectives, SCE provides comments on a few topics below.

RISK-INFORMED, DATA SUPPORTED DECISIONS

Though SCE strongly supports improved data and analyses to guide wildfire mitigation, identified enhancements should be based on clear objectives and meaningful applicability. They should also be balanced with current capabilities and viable timelines for enhancements. For example, the focus for undertaking wildfire mitigation initiatives should be based on expected benefits, not rigid application of risk analysis. In some instances, such as grid hardening, the benefits are ignition risk reduction and can be associated with quantitative metrics such as risk-spend efficiency. In other instances, the benefits are to improve modeling capability, explore new technologies or provide better customer care. These activities are essential, but do not reduce ignition or wildfire risks and should be evaluated based on relevant value.

DRIVERS OF UTILITY WILDFIRE RISK

SCE also agrees with the WSD's enumeration of the drivers of utility wildfire risk being climate change, fire management and suppression, and continued expansion of developments in wildfire urban interface area, along with the potential of ignitions associated with utility infrastructure. SCE appreciates the WSD's recognition that many factors contributing to wildfire risk are beyond the utilities' control, and that utilities have made significant progress in developing and deploying wildfire mitigation plans to address wildfire risks to protect our customers and communities.

Moreover, as the WSD states in Section 1.2, "The WSD and California utilities are already implementing many best practices in order to prevent utility-related ignitions and minimize the severity of wildfires. IOUs in California are enhancing vegetation management practices and investing in innovative technologies, described in their 2020 WMP submissions. They are also investing in advanced fire propagation and simulation modeling to conduct more sophisticated risk assessment and mapping. However, directly replicating one mitigation approach to other utility service territories is not always the best approach as it may not account for the current and projected future differences between the size of the utilities' customer base and systems, as well as the variability and complexity in climate, ecosystems, and demographics. In California this is especially true, with differences amongst the three largest IOU service territories." In the spirit of continuous improvement, SCE supports exploration of innovative practices such as the ones highlighted by the WSD for vegetation management, technology innovation, and risk assessment, but such efforts must be transparent and collaborative and be rationalized with utilities' unique service territories (and ignition drivers) and current compliance requirements prior to implementation. On the other hand, any incentive programs or performance-based ratemaking will have broader implications beyond wildfire mitigation and should be separately considered by the CPUC.

VISION AND OBJECTIVES

In its roadmap, the WSD proposes a definition for “catastrophic wildfires.” As the WSD points out, the term “catastrophic wildfire” is already being used in legislation, reports and action plans. For example, the term “catastrophic wildfire” is used in AB 1054¹ as well as proposed changes to the Commission’s Rules of Practice and Procedure. Further defining this term here may lead to conflicting and confusing interpretations. Moreover, the definition presented in the roadmap may be too exclusionary and arbitrary. For example, under the definition in the roadmap, a fire that burned 140,000 acres but zero structures would be categorized as catastrophic, but a fire that burned 100,000 acres and destroyed 400 structures would not.

Utility wildfire mitigation plans should continue to focus on reducing any potential ignitions associated with utility infrastructure, as many ignitions may turn into catastrophic wildfires due to factors outside the utilities’ control such as real-time weather conditions, third-party fire-fighting responsiveness, and the underlying increased developments in the wildland-urban interface. This is a complex topic and a shared understanding of definitions and uses can only be achieved through a transparent and collaborative stakeholder process. SCE supports initiating a stakeholder process to discuss the need for a new definition of catastrophic wildfires and develop one if deemed appropriate.

SCE supports the broad vision and objectives of wildfire mitigation in terms of public safety, property loss, natural resource preservation, reliability, affordability and climate action, but notes that there are natural tensions among these objectives that need to be balanced. For example, helping ensure public safety will require having PSPS available as a tool in our wildfire mitigation toolkit, but SCE endeavors to reduce the frequency, scope and impact of PSPS through grid hardening, enhanced modeling and mitigating customer impacts during de-energization. Similarly, though reliance on green resources for backup power is desirable, feasibility and affordability have to be weighed as well.

COLLABORATION AREAS FOR THE WSD AND UTILITIES

Finally, SCE agrees with the WSD that active collaboration among WSD, utilities and other agencies has to be the cornerstone of mitigating one of the highest risks facing California. Such collaboration can start immediately, following up on the 2020-2022 WMP Resolutions for topics such as additional GIS data needs and alternatives to Risk Spend Efficiency calculations for WMP initiatives, when appropriate. SCE would also like to engage in a more transparent and collaborative process for the refinement and use of the next iteration of a Wildfire Mitigation Capability Maturity Model and the associated surveys and scoring rubric. The inaugural process, with shortened timelines during the 2020 WMP cycle, did not allow for incorporation of participant comments or the benefit of receiving detailed clarifications from the WSD. This posed significant challenges as many questions in the survey were either subject to interpretation or did

¹ Public Utilities Code Section 850.

not align with how SCE approaches wildfire mitigation specifically, and grid design and operations broadly. SCE looks forward to regular and ongoing engagement among stakeholders to drive practical and meaningful WMP development and deployment.

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

Sincerely,

//s//

Carla Peterman
Senior Vice President, Regulatory Affairs
Southern California Edison

cc: Jaime Ormond, Energy Division, CPUC
Katherine Stockton, Executive Division, CPUC