

September 9, 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 First Quarterly Report on 2020-2022 Wildfire Mitigation Plan for Class B Deficiencies

Dear Ms. Thomas Jacobs,

Southern California Edison (SCE) is submitting its first Quarterly Report (QR), attached herein, for Class B deficiencies pursuant to Wildfire Safety Division (WSD) Resolutions WSD-002 and WSD-004 (Resolutions) that were ratified by the California Public Utilities Commission (CPUC or Commission) on June 11, 2020. In its Resolutions, the WSD identified 28 Class B deficiencies that require SCE to submit QRs to address the deficiencies' conditions. The first QR for all 28 Class B deficiencies is due by September 9, 2020 and four Class B deficiencies identified as having ongoing QR requirements have subsequent QRs due every three months thereafter, currently scheduled through June 2021.<sup>1</sup>

The Guidance Statement detailed, among other things, the process that the WSD will implement to evaluate QRs. The Guidance Statement provides that:

[T]he WSD will evaluate the sufficiency of an electrical corporation's QR filing in accordance with the following factors:

- Completeness – The QR is complete and comprehensively responds to the condition;
- Effectiveness – The information provided in the QR reasonably resolves the deficiency.

SCE's first QR includes responses to 28 deficiencies, 10 included in WSD-002 (referred to as Guidance deficiencies and apply to all electric utilities) and 18 included in WSD-004 (referred to as SCE deficiencies and apply only to SCE). SCE's 28 QR responses are comprehensive, focusing on SCE's wildfire mitigation efforts in our High Fire Risk Areas (HFRA) and reasonably address the deficiencies. In one instance, Guidance-10, SCE reasonably addresses the deficiency's conditions but notes that the WSD, on August 21, 2020, issued a new Draft WSD GIS Data Reporting Requirements and Schema for California Electric Corporations (Draft GIS

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<sup>1</sup> See WSD's July 17, 2020 Guidance on the Remedial Compliance Plan & Quarterly Report Process Set Forth in Resolution WSD-002 (Guidance Statement), Table 2, p. 3.

Data Schema) that goes beyond this deficiency's conditions and requires significant amounts of data, some of which SCE has not previously collected. Given the short time period from issuance of the Draft GIS Data Schema to this first QR submission, SCE is unable to provide all requested data at this time.<sup>2</sup> SCE appreciates the WSD acknowledging how utilities are at different stages of their data journey and how the Draft GIS Data Schema is intended to be a phased approach. As further described in our Guidance-10 response, SCE is committed to incrementally providing more data and details in subsequent QR submissions to meet the Draft GIS Data Schema requirements.

SCE looks forward to the WSD's review of our first QR and welcomes a meeting to discuss our responses if the WSD would find that useful. If you have any questions, or require additional information, please contact me at [carla.peterman@sce.com](mailto:carla.peterman@sce.com).

Sincerely,

//s//

Carla Peterman  
Senior Vice President, Regulatory Affairs  
Southern California Edison

cc: R-18-10-007  
[WildfireSafetyDivision@cpuc.ca.gov](mailto:WildfireSafetyDivision@cpuc.ca.gov)  
[CALFIREUtilityFireMitigationUnit@fire.ca.gov](mailto:CALFIREUtilityFireMitigationUnit@fire.ca.gov)

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<sup>2</sup> See SCE's response to Guidance-10 and the accompanying Geodatabase and Status Report templates that explain the data SCE is providing and the data SCE is not providing at this time, as well as SCE's expectations to incrementally provide more data with subsequent QR submissions.