

January 13, 2021

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

**SUBJECT:** Southern California Edison's Reply to Comments on its Second Quarterly Report

Director Thomas Jacobs,

Pursuant to the Guidance on the Remedial Compliance Plan & Quarterly Report Process Set Forth in Resolution WSD-002 issued by the Wildfire Safety Division (WSD) on July 17, 2020 and the 2021 Wildfire Mitigation Plan (WMP) timeline for the Investor-Owned Utilities (IOUs) included in Attachment 3 of Resolution WSD-011, Southern California Edison Company (SCE) hereby submits its reply in response to the public comments served on January 6, 2021 on SCE's 2020-2022 Wildfire Mitigation Plan (WMP) second Quarterly Report (QR).

### **INTRODUCTION**

On December 9, 2020, SCE submitted its second QR for Class B deficiencies pursuant to 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 five Class B deficiencies that require SCE to submit ongoing QRs to address the deficiencies' conditions. SCE's first QR for all 28 Class B deficiencies was submitted on September 9, 2020. SCE's second QR includes updated responses to the five ongoing Class B deficiencies, Guidance-9 and Guidance-10 included in WSD-002 (referred to as Guidance deficiencies and apply to all electric utilities), and SCE-5, SCE-9, and SCE-20 included in WSD-004 (referred to as SCE deficiencies and apply only to SCE). SCE's second QR provides additional information and status updates, as applicable, for these five ongoing QR responses. Only Mussey Grade Road Alliance (MGRA) and the Green Power Institute (GPI) submitted comments on SCE's second QR. GPI recommends SCE and other utilities with advanced wildfire risk models provide a public demonstration of its models in 2021 and/or 2022. This recommendation relates to Class B deficiency SCE-5. MGRA recommends additional information and/or changes in approach to two of SCE's alternative technology projects and rejection of SCE's confidential determinations. These recommendations relate to Class B deficiencies Guidance-9 and Guidance-10, respectively. SCE responds to these comments below by the Class B deficiency identifier.

### **CLASS B DEFICIENCY: SCE-5**

SCE appreciates GPI's assessment of and interest in the status of implementing Technosylva's Wildfire Risk Reduction Module (WRRM). GPI recommends SCE and other Utilities with similarly advanced wildfire risk models provide a demonstration, through a public workshop, of model capabilities, outputs and how the outputs are used to inform wildfire risk mitigation strategies, especially granular (e.g., asset and circuit-level) initiative prioritization decision making in 2021 and/or

2022, prior to the next 3-year WMP filing cycle.<sup>1</sup> SCE will be providing WSD staff a demonstration of its WRRM in early February 2021 after submitting its 2021 WMP Update. Notwithstanding the fact that GPI's request is outside the scope of this Class B deficiency's conditions, SCE will discuss with WSD staff the confidential sensitivities of the WRRM and the best approach for setting up a demonstration with stakeholders. SCE supports transparency and demonstrating the capabilities of its WRRM. The WRRM, though, clearly identifies areas where a fire could cause maximum damage based on a single variable (acres, population, and/or structures), or a combination of these variables. Additionally, the WRRM shows areas of high potential for equipment failure in our system. It is not in the public's interest to share this information in a publicly-open forum and instead should be treated as confidential given that a bad actor could use this information and cause devastating harm to SCE customers and the communities we serve. SCE believes there are ways to conduct a demonstration with stakeholders and safeguard this information and thus supports GPI's recommendation so long as the information shared is protected.

### **CLASS B DEFICIENCY: GUIDANCE-9**

MGRA makes specific comments on a few of SCE's alternative technology pilot programs. First, MGRA references SCE's Meter Alarming for Down Energized Conductor (MADEC) evaluation (AT-1) in suggesting its report is missing information.<sup>2</sup> MGRA misunderstands SCE's MADEC pilot. SCE operates MADEC across its distribution system for bare and covered conductor wire systems. This evaluation is assessing possible improvements to the Machine Learning (ML) algorithm for covered conductor, which are expected to exhibit different electrical transient signals than bare conductor. This pilot requires more data from *actual* downed energized covered conductor events in the field in order to substantiate algorithm revisions. The MADEC system is operational and this pilot is intended to improve the ML algorithm for covered conductor, which requires actual data from events in the field. MGRA's recommendations are thus misplaced and do not apply to SCE's MADEC evaluation.

Second, MGRA recommends SCE provide a schedule for pilot validation and a timeline for deployment of its Rapid Earth Fault Current Limiting (REFCL) pilots (AT 3.1, AT 3.2, AT 3.3).<sup>3</sup> In its QRs, SCE explained that while REFCL has promising benefits in reducing ignition risk, these technologies are complex, costly, and can take up to three years to install. SCE is thus piloting three REFCL technologies to learn how they can work on different parts of our system and what if any system reconfiguration may be required prior to deploying across our HFRA. Two pilots (AT 3.1 and At 3.2) are still in the engineering and project design phase whereas the AT 3.3 – Isolation Transformer pilot has been installed. Once all the pilots are operational, SCE will confirm the technologies work as expected (or not), document the system configurations for each technology and will develop an operational strategy considerate of each technology and application, and will develop priority locations for candidate installations. Given the complexity of these pilots, once all are operating, SCE will develop a pilot validation timeline and will include this information in subsequent QRs. Should these pilots be successful, a deployment plan will then be developed.

### **CLASS B DEFICIENCY: GUIDANCE-10**

SCE's Guidance-10 response explains the additional data we provided since our first QR submission, the data we are still working on and reiterated the importance of maintaining confidentiality to protect

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<sup>1</sup> GPI Comments at p. 2.

<sup>2</sup> MGRA Comments at pp. 3-4.

<sup>3</sup> MGRA Comments at p. 6.

critical utility information that if were made public could provide a bad actor with information that could cause grave consequences to our customers and the communities we serve and our facilities. MGRA recommends the WSD reject SCE's confidential determinations and require SCE to provide non-confidential versions of its data to the public, including that from feature class data with mixed confidential and non-confidential fields.<sup>4</sup> SCE supports responsible transparency of all utility information but strongly opposes making critical utility information public when that information can be used to harm the communities we serve. It is a fact that many fires in California are caused by bad actors. According to CAL FIRE, annual arson *arrests* from 2016 through 2019 have averaged 72.5 per year.<sup>5</sup> 2020 was far worse and through September/October 2020 there were 115 arson *arrests* (which will likely increase once full-year 2020 data is available), an increase of approximately 60% over the 2016-2019 annual average. This data also represents *actual arrests* and the number of arson-ignited fires is likely even greater. This is concerning to SCE and should be a concern to stakeholders and the Commission. MGRA suggests that providing asset age information is in the public interest. MGRA is correct if only asset age were provided. SCE could publicly provide just the asset age of its assets; however, the WSD's draft GIS Schema requires relational data tables. This means that asset data needs a unique identifier to correlate asset information such as age of equipment with other asset information such as location, ignition data and consequence information. For these reasons, SCE applied confidentiality at the feature class level for each provided dataset as opposed to the data field level. Thus, while a data element such as equipment age may be deemed non-confidential on a standalone basis, when that data is related to, for example, location and ignition data, it could provide critical information to a bad actor putting SCE facilities and communities we serve at grave risk. As such, even non-confidential data elements in a relational Geodatabase could pose a significant risk. Notwithstanding these concerns, SCE is working towards identifying confidentiality at the field level for its next Quarterly Report submission. Given the constraints of the draft GIS Data Schema, it may not be possible to replicate the Geodatabase with just non-confidential data. Standard Commission confidential processes require stakeholders to enter into Non-disclosure Agreements (NDAs) to protect confidential information. WSD should reject MGRA's recommendations on confidentiality and direct them to use the Commission's established confidentiality processes for access to the Geodatabase until the WSD creates its data portal with strict security protocols.

## **CONCLUSION**

SCE appreciates the opportunity to submit its reply to stakeholder comments and recommends the WSD approve SCE's second QR taking into consideration its comments herein.

If you have any questions, or require additional information, please contact me at [carla.peterman@sce.com](mailto:carla.peterman@sce.com).

Sincerely,

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Southern California Edison

cc: Service List for R.18-10-007

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<sup>4</sup> MGRA Comments at pp. 6-7.

<sup>5</sup> See <https://www.fire.ca.gov/media/1bqlpsdu/arsonarrests.pdf>.

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