

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

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

R.18-10-007

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) OPENING COMMENTS ON
GUIDANCE PROPOSED DECISION ON 2019 WILDFIRE MITIGATION PLANS
SUBMITTED PURSUANT TO SENATE BILL 901**

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SUBJECT INDEX OF RECOMMENDED CHANGES

- The Commission should revise the Guidance PD to provide meaningful regulatory guidance to the utilities regarding what Wildfire Mitigation Plan (WMP) approval “means.” The programs and activities in the utilities’ WMPs are designed to achieve the “highest level of safety” and the Commission should recognize and endorse those efforts.
- The Guidance PD’s “risk assessment” methodological proposals should be limited in the near-term to programs and activities that meet the Commission’s existing financial thresholds for such analysis or that have been previously evaluated in RAMP.
- “Outcome-based” measurements to evaluate WMP program effectiveness are important, but the PD should appropriately recognize that in the near-term those proposed “metrics” are largely outside of the reasonable control of the utilities, and that it will likely take several WMP cycles to effectively and fairly judge the long-term efficacy of the proposed activities.
- The Guidance PD should be modified to conform with SB 901 and existing Commission General Orders requirements regarding inspection reporting criteria. The final decision resulting from this extremely expedited proceeding should not re-write long-standing Commission General Orders, which have been measuredly developed over decades with detailed input from staff and many parties.
- The Guidance PD’s “offramp” provision should be clarified to include consideration of utility-identified improvements to current programs.
- The various going-forward procedural filing requirements should be modified to most efficiently conserve scarce Commission and party resources.

Pursuant to California Public Utilities Commission (Commission or CPUC) Rule of Practice and Procedure 14.3, Southern California Edison Company (SCE) respectfully submits these Opening Comments on the Guidance Proposed Decision (Guidance PD). In compliance with Administrative Law Judge Thomas’s direction in a May 7, 2019 email ruling, SCE structures its Opening Comments below pursuant to the “common outline based on the headings in the Guidance Decision.” In addition, pursuant to Rule 14.3(b) and (c), in Appendix A attached hereto SCE proposes specific language changes to the PD’s proposed Findings of Fact, Conclusions of Law, and Ordering Paragraphs.

I.

SCE OPENING COMMENTS ON GUIDANCE PROPOSED DECISION

4. Requirements of SB 901

The PD misstates SB 901’s requirements when it claims that Section 8386(c)(10) requires “[a] ranking of ‘*all wildfire risks, and drivers for those risks,*’ throughout the filer’s service territory, which shall include wildfire risk and risk mitigation information contained in the utility’s Safety Model Assessment Proceeding (S-MAP) and Risk Assessment Mitigation Phase (RAMP) filings”¹ The statute does not require any such inflexible “ranking.” Instead, the statute requires “[a] list that identifies, describes, and prioritizes” any relevant risks.² As discussed in more detail in Section 8 below, the Commission should not at this early stage be overly prescriptive in requiring utilization of quantitative measures to “rank” all WMP-related programs, but should instead limit RAMP or MAVF methodology criteria to programs that have been previously evaluated in RAMP or that meet the financial impact thresholds set forth in the S-MAP settlement. In addition, the PD should explicitly recognize that other factors outside of stand-alone risk analysis, such as resource availability, field conditions, and emergent events, are valid and relevant considerations when evaluating WMP programs.

¹ Guidance PD at p. 12 (underline added, italics original in Guidance PD (not in the statute)).

² See Public Utilities Code (P.U.C.) Section 8386(c)(10).

5. **Meaning of Commission Approval of WMP Under SB 901**

After discussing at some length what Commission approval of a WMP does not mean (*e.g.*, an approval of cost reasonableness,³ a determination of prudent utility management,⁴ a measurement of “substantial compliance,”⁵ and a refusal to even “consider” let alone “approve” program costs⁶), the Guidance PD then asks: “The question remains: what does WMP approval mean?”⁷ The Guidance PD answers its own question in the narrowest way possible: “[A]pproval means that every WMP contains 19 elements that the SB 901 Legislature deemed essential to catastrophic wildfire mitigation. Without SB 901, existing wildfire-prevention and other safety requirements might not include all of the elements on the list.”⁸

SCE respectfully submits that the Legislature did not intend for Commission approval of these critical public-safety and utility infrastructure plans to be limited to literally a “check-the-list” exercise. Such a determination would not fulfill this Commission’s responsibilities to protect the public, is inconsistent with the Commission’s approvals of the utilities’ WMPs in the utility-specific PDs, and would provide the utilities no regulatory guidance about what the Commission believes is appropriate and prudent to mitigate wildfire risk.

First, if the only thing Commission approval of a WMP means is a confirmation that a utility has “listed” the 19 items contemplated in the statute, that would be inconsistent with the statute’s primary consideration and overarching requirement; namely that the utilities’ WMPs implement programs that are designed to achieve the “*highest* level of safety, reliability and resiliency.”⁹ The Commission’s sign-off that the utilities successfully “listed” 19 things is not equivalent to a determination that those are the right programs and activities (and at the right levels) to ensure the “highest” level of safety, reliability and resiliency.

Second, in language approving the utilities’ specific WMPs, the Commission clearly indicates that it *does* have strong preferences about what programs and activities it considers ideal,¹⁰ which ones it

³ Guidance PD at p. 22.

⁴ Guidance PD at p. 20.

⁵ Guidance PD at pp. 23-24.

⁶ Guidance PD at p. 24.

⁷ Guidance PD at p. 24.

⁸ Guidance PD at p. 24.

⁹ P.U.C. Section 8386(c)(12) (emphasis added).

¹⁰ *See, e.g.*, SCE PD at p. 32 (situational awareness and alternative technologies).

considers appropriate but which require further refinement or clarification,¹¹ and which ones it has concerns about.¹² It is inconsistent for the Guidance PD on the one hand to determine that Commission approval means only that the utilities have listed the 19 things the statute requires, but on the other hand requiring and opining on scope and cost data about specific programs and activities.¹³ That is especially inappropriate when considering the Guidance PD *would* impose specific prescriptive reporting requirements for those programs that is wholly untethered from the statutory language, as discussed further below.

Third, it is inconsistent with the longstanding regulatory compact for the Commission to not provide some degree of assurance that those activities and programs that it provides specific guidance on through its approval of the utility-specific WMPs (including their scope and high-level costs) are in some way “approved.” It is untenable to require the utilities to propose programs that achieve the “highest” level of safety, but to give no up-front indication that the scope of those programs is generally reasonable and prudent. As stated in SCE’s Reply Comments, this is far from a “guaranteed cost recovery,” “blank check” request; rather it is a reasonable request for some measure of regulatory certainty, namely that approval of the WMPs means approval of the scope of the programs and activities set forth there,¹⁴ that prudently incurred costs associated with those programs and activities (to be reviewed in future GRCs or other proceedings) will be eligible for future cost recovery, and that substantial compliance with Commission-approved WMP requirements should mean that the utilities are acting as prudent managers of their systems.

Nothing in SB 901 precludes this common-sense interpretation of what plan approval “means.” Relevant statutes specifically contemplate that compliance with the performance metrics should inform a future reasonableness review of certain costs,¹⁵ and also authorize memorandum accounts to track costs

¹¹ See, e.g., SCE PD at p. 17 (covered conductor).

¹² See, e.g., SCE PD at pp. 21-24 (enhanced vegetation management).

¹³ See, e.g., SCE PD at p. 13 (observing “that installing covered conductors is costly”); Guidance PD at p. 3 (“Generally speaking, the key and most costly aspects of the individual Wildfire Mitigation Plans consist of vegetation management; system hardening . . .; new inspection programs; and ‘situational awareness’ technology . . .”).

¹⁴ In addition, if WMP approval does not mean approval of specific programs and activities, any future compliance audit of the WMPs would be meaningless. See also Guidance PD at p. 20: “One of the factors relevant to recovery of such costs – which occur after a catastrophic wildfire – is ‘The electrical corporation’s compliance with regulations, laws, commission orders, and its wildfire mitigation plans prepared pursuant to Section 8386, including its history of compliance.’”

¹⁵ See P.U.C. Section 451.1(9).

for future cost recovery.¹⁶ SCE is recommending the Commission develop an upfront approach that appropriately takes into account the fact that many of the factors listed in Section 451.1 substantially overlap with the content of the utilities' WMPs. As SCE has made clear, while the statutory language does not explicitly mandate that compliance with the approved WMP is equivalent to a finding that the utilities met the "prudent manager" standard, neither does it preclude such an interpretation. It is well within the Commission's inherent authority to interpret the statute that way.

SCE is not seeking to weaken the traditional standard, nor create a new one. The prudent manager standard has always meant that the Legislature passes laws, the Commission implements them through interpretation and the promulgation of regulations, and the utilities follow those rules and regulations in conjunction with sound management judgment informed by good utility practices. Nothing SCE proposed in this proceeding is inconsistent with that traditional process. The Legislature passed SB 901, which required the use of performance metrics to implement wildfire mitigation plans and activities that would inform a future reasonableness review of the costs associated therewith. The Commission opened this Rulemaking to consider which specific metrics, programs, and activities were necessary and appropriate to best reduce wildfire risk associated with utility infrastructure. SCE proposed a suite of programs and activities to accomplish those goals and provided the Commission-required cost estimates associated with them. After the Commission approves the WMP, to the extent that SCE executes on them consistent with sound management judgment informed by good utility practices, and also demonstrates compliance with the requirements set forth therein, it should be judged to have been prudent managers of its system. This is not a "radical change"¹⁷ to the "prudent manager" standard; rather it honors its traditional embodiment.

Finally, the Guidance PD holds that "substantial compliance" is only "relevant to whether penalties are proper, not whether rate recovery is appropriate."¹⁸ But the Guidance PD is also critical of the utilities' "performance-based" (rather than "outcome-based") metrics, and nowhere in the utility-specific WMP approval PDs does the Commission explicitly approve a specific scope of work for the WMP programs. In addition, the utility-specific PDs specifically decline to equate the utility-proposed metrics with "compliance" metrics.¹⁹ But SB 901 also requires the utilities to hire Independent

¹⁶ See P.U.C. Section 8386(j).

¹⁷ See March 13, 2019 TURN Comments at p. 11.

¹⁸ Guidance PD at pp. 23-24.

¹⁹ See, e.g., SCE PD at pp. 43-44.

Evaluators (IEs) to “review and assess the electrical corporation’s compliance with its plan.”²⁰ In addition, the IEs must “determine whether the electrical corporation failed to fund any activities included in its plan.”²¹ In compliance audits or reviews, compliance is typically judged against Commission-approved regulatory requirements or activities. Here, if the Commission is not “approving” specific activities and targets (with their associated estimated costs), the IE will not have any Commission- approved requirements or activities against which to measure SCE’s compliance. This disconnect illustrates how the Guidance PD provides little meaningful guidance on what standards the utilities will be measured against when determining “substantial compliance” with the approved plans in the future.

6. Metrics, Monitoring and Reporting Required of All WMP Filers

The Guidance PD requires metrics that track the number of elevated fire danger days and the number and types of potential ignition events that occur on those days. SCE agrees that consistent tracking for these data points and other outcome-based data related to wildfires will be necessary to support analysis and understanding wildfire risk caused by electrical lines and equipment. As stated in SCE’s 2019 WMP, SCE expects that analysis of outcome-based measures, referred to as “indicators” in the 2019 WMP, will inform views on how effective SCE’s mitigation strategies and programs are over time.

SCE tracks the count of potential ignition events with the CPUC Reportable Ignitions measure. As stated in the 2019 WMP, this measure tracks any event where utility facilities are associated with (a) a self-propagating fire of material other than electrical and/or communication facility, (b) the resulting fire traveled greater than one linear meter from the ignition point, and (c) the utility has knowledge that the fire occurred. In addition to these attributes that qualify an event for this measure, the reportable ignition data tracked by SCE includes several fields to track the type of the ignition event, including type of utility equipment (*e.g.*, overhead, padmounted, subsurface) and suspected initiating event or driver (*e.g.*, contact from object, equipment/facility failure, wire-wire contact).

SCE also tracks other key outcome-based measures, including counts of wire down events and faults on circuits in High Fire Risk Areas (HFRA). A variety of attributes are documented for these

²⁰ P.U.C. Section 8386(h)(2)(B)(i).

²¹ *Id.*

outcome-based measures, including driver details that document the suspected initiating event such as contact from object and equipment failure. SCE anticipates that analysis associated with counts by driver-type across multiple outcome-based measures will inform evaluations on the effectiveness of various programs included in the SCE WMP over the course of several years.²²

Longer-term trends in outcome-based measures, such as those identified as “indicators” in the 2019 WMP, are necessary to measure the effectiveness of wildfire mitigations over time, however these measures are not well-suited to measure program effectiveness for a single year.²³ In the short term, it is important for SCE to monitor that planned work is being performed in a timely and quality-controlled manner along with continuing to evaluate the efficacy of the programs developed, and identify modifications or refinements as appropriate. Over relatively short periods of time such as one year, SCE relies on execution-based measures such as those defined as “metrics” in the metrics chapter of the 2019 WMP to help ensure that risk mitigation work is being completed per its WMP.

7. Evaluation of Current Inspection Plans

The PD appropriately cites Section 8386(c)(19)(C) and the requirement for electrical corporations to “monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, carried out under the plan and other applicable statutes and commission rules.”²⁴ The PD goes on to state that “because many of the existing inspection practices include simple drive-by patrols or are limited to visual observation, they may not be effective in detecting anything but the most egregious problems with overhead utility poles, lines and other equipment.”²⁵ Furthermore, the PD claims that “the WMPs filed do little to address this issue.”²⁶ As a result, the PD concludes the discussion with additional requirements beyond what is required by Section 8386(c)(19)(C), by stating that “at a minimum, the discussion should detail what the inspection is looking for, the number of each type of inspection conducted, the cost of each type of inspection, and a

²² SCE does not identify elevated fire danger days as a metric or indicator in the Performance Metrics and Monitoring chapter, however SCE tracks Red Flag Warnings and utilizes an internal Fire Potential Index (FPI) tool to estimate wildfire potential based on weather and fuel conditions. SCE supports tracking of elevated fire danger days and plans to continue tracking using both methods.

²³ See also SCE Comments on SCE PD at pp. 12-14.

²⁴ Guidance PD at p. 27.

²⁵ Guidance PD at p. 27.

²⁶ Guidance PD at p. 27.

listing of the top five violations or hazards identified by each inspection program, including its location and GO 95, Rule 18 priority level rating.”²⁷

SCE disagrees with the PD’s characterization that many of the existing inspection practices involve a “simple drive-by patrol” and that the existing inspection programs “may not be effective in detecting anything but the most egregious problems.” As described in Section 4.2.3.1 of SCE’s WMP, EOI is not a “drive-by” patrols program, but rather involves thorough inspections performed by qualified electrical works (the same employees that build and maintain electrical systems), and focused specifically on detecting and remediating potential ignition risks.²⁸ Furthermore, Section 4.2.2 of SCE’s 2019 WMP describes the existing inspection programs, many of which are required by GO 165 (which details their specific requirements). As explained in GO 165, only the “Patrol” inspection is defined as a “simple visual inspection,” and many of the other inspections involve more detailed and thorough assessments. Moreover, these previous programs have been included and approved in SCE’s GRCs for many years. Similarly, the EOI is subject to audit by the Commission following the completion of the 2019 WMP.

Additionally, as explained in Section 4.2.2.5 of SCE’s WMP, the Quality Oversight/Quality Control group performs quality assessments of these GO 165 inspections and various other activities. Section 4.2.3 of SCE’s 2019 WMP describes the new inspections SCE is conducting to keep pace with the rapidly evolving wildfire risks. The WMP explains that, in response to evolving wildfire risk, EOI is incremental to existing inspection and maintenance programs described in Section 4.2.2 of the WMP, and Sections 4.2.3.2 and 6.5.3 of SCE’s 2019 WMP describe how SCE monitors and audits effectiveness of inspections carried out under the plan. The decision resulting from this extremely expedited proceeding should not re-write long-standing Commission General Orders, which have been measuredly developed over decades with detailed input from staff and many parties. The additional requirements regarding inspection plans contained in the PD are unnecessary, unwarranted and should be removed from the final decision.

²⁷ Guidance PD at p. 27.

²⁸ Qualified Electrical Workers are trained resources capable of working on SCE’s high voltage, overhead and underground electrical system. They can perform inspections and maintenance, assess system damages, make repairs to restore service, and serve as SCE’s first responders.

8. Integration of GRC Process with WMP Review

SCE supports the Guidance PD's recommendation that future WMP filings should provide the elements necessary to evaluate the cost effectiveness of proposed programs and strategies in terms of risk reduction. It should be noted however that while the Multi-Variable Value Function (MAVF) methodology has been adopted in the S-MAP settlement, that settlement requires SCE to use the methodology starting in its RAMP report to be filed in November 2021. Accordingly, SCE is currently in the process of developing its MAVF methodology and does not expect this process to be complete prior to the 2020 WMP filing.

However, SCE is already using risk analysis, as presented in its 2018 RAMP report. Importantly, these RAMP-based models already "provide[] a single value to measure the combined effects of each mitigation measure on a certain risk event [and] provide[] a means to compare the programs against each other for effectiveness, especially when multiple overlapping programs are proposed for the same assets and intended to mitigate the same risk event."²⁹ This is the point of the Guidance PD's proposed requirement to use MAVF for all programs and activities. SCE respectfully requests that for the next WMP filing the Commission limit the required utilization of quantitative risk-informed decision making, such as SCE's RAMP methodology or MAVF, to the programs designed to lower the risk of ignitions that can potentially become catastrophic, and with the most material financial impact to customers (*e.g.*, for SCE, WCCP and vegetation management programs). Moreover, even when MAVF is fully implemented in late 2021 per the S-MAP settlement, SCE requests the Commission clarify that only the WMP programs and activities that have been previously evaluated in RAMP or that meet that the S-MAP settlement's cost criteria threshold be subject to MAVF.³⁰

In addition, SCE will continue refining its data and analyses over time. For example, SCE is developing and utilizing sophisticated models to refine how work within important programs is prioritized based on risk factors. As risk and other analyses are modified or refined to drive WMP activities and programs, SCE will share the changes transparently in subsequent filings. The wildfire

²⁹ Guidance PD at p. 28.

³⁰ See May 2, 2018 Settlement Agreement Among Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, San Diego Gas & Electric Company, The Utility Reform Network, Energy Producers and Users Coalition, Indicated Shippers, and the Office of Ratepayer Advocates Appendix A at p. A-15 in A.15-05-002. Additionally, where it is no longer applicable to perform a MAVF risk analysis on a program or activity in RAMP (due to, for example, program completion, improvements in modeling, etc.) SCE will explain why the MAVF is not being applied in the WMP.

risk mitigation proposals presented in any WMP or other proceeding is based on the best knowledge at that time. Improved data and analytics available in a different WMP or proceeding should not prejudice requests put forward earlier. This would have the undesirable effect of potentially chilling continuous improvement. Moreover, for wildfire risk, the metrics and analyses agreed upon in the WMP proceedings, which are focused on wildfire, should supersede any metrics or analyses requirement from S-MAP. Finally, it is crucial to recognize that risk analysis is one of several important inputs to management decision making on funding and resource allocation. Practical considerations of resource availability, field conditions, emergent events, and operational judgment must supplement the results of risk analyses as SCE develops its wildfire mitigation proposals.

9. Off Ramps

SCE appreciates the Guidance PD's determination that "[i]t is essential that there be a process for modifying, reducing, increasing, or ending mitigation measures that are not working"³¹ and affording the utilities the flexibility to inform the Commission of necessary "mid-course corrections" to planned work and activities reflected in the annual WMPs. Indeed, SCE specifically previewed the need for such flexibility in its 2019 WMP:

In addition, the Commission has long recognized that utilities need appropriate flexibility to use management discretion to assess and respond to emergent risks and as they arise. Because ... activities described in this WMP are in the early stages of development and deployment, such flexibility will be especially important. If such circumstances arise, SCE will make changes, as appropriate, to its wildfire risk mitigation efforts consistent with the Commission's expectation that utilities will exercise operational discretion and flexibility to maintain safe, reliable, and resilient service for their customers, and will inform the Commission should such changes in 2019 significantly deviate from this WMP. In the event that it is necessary and appropriate to make mid-year changes ... SCE will seek timely approval from the Commission for such changes or deviations.³²

SCE requests three changes. First, the necessary flexibility the Guidance PD appropriately provides should be expanded from allowing modifications or terminations of "mitigation measures that are *not* working,"³³ to include improvements for those that *are* working, but for which the utility has subsequently discovered methodological improvements or programmatic changes that more efficiently

³¹ Guidance PD at p. 29.

³² SCE 2019 WMP, p. 8.

³³ Guidance PD at p. 29 (emphasis added).

and/or expeditiously mitigate wildfire risk for customers. For SCE, a likely “mid-course correction” for 2019 will be a refinement to its WCCP risk-prioritization methodology, which will use more advanced analytics to assess overhead conductor wildfire risk on a more granular level,³⁴ in line with TURN’s recommendations in SCE’s Grid Safety & Resiliency Program (GSRP) proceeding. While the details of that particular improvement are more appropriately resolved in that proceeding, it is important for the Commission in this proceeding to more broadly send a clear message to the utilities that continuous improvement is important, and in fact is expected. SCE believes that may have been the Guidance PD’s actual intent (especially because it contemplates “increasing” certain programs), and respectfully provides suggested clarification edits to the relevant Conclusion of Law in Appendix A.

Second, the PD should be modified to require one, optional “Off Ramp” filing, within six months after the decision date of this WMP cycle, and a symmetrical requirement for future WMP cycles. There is no need for a second filing, which the current PD would make due during a time period that the next WMP will be undergoing consideration for approval. Any course corrections at that time can be considered in the WMP cycle then being litigated.

Third, as noted below and in SCE’s Comments on the SCE PD, SCE is concerned that the PD would establish a series of administratively inefficient and burdensome filing and approval processes that are not merited, and in some cases will be counterproductive, by requiring utilities to file several Tier 3 and Tier 1 Advice Letters (ALs). Tier 3 ALs take a minimum of four months to resolve, and often much longer. Instead of the current annual WMP approval process, such a requirement would lead to many, additional subsequent and untimely “mini-WMP” approvals throughout the yearly cycle and carrying over into subsequent years. While SCE appreciates the Commission’s focus and urgency on this year’s WMP filing, it should not establish a burdensome administrative process that is not necessary and that would strain all parties’ resources.³⁵ Finally, the Commission should not have to “approve” the utilities’ Off Ramp filings. Rather, they should be considered compliance filings and pursuant to GO 96-B these should be information-only submittals, especially considering the utility-specific PDs

³⁴ See SCE Comments on SCE PD at pp. 6-7 for a more thorough discussion of this anticipated re-prioritization change.

³⁵ For example, a Tier 3 Off Ramp filing in November would likely not get approved by the Commission until after the following year’s WMP is filed (assuming utilities file their WMPs in February). Putting in place this approval process during the development of the following year’s WMP would be counterproductive. Moreover, utilities are already required, by statute, to file a compliance report three months after the end of the WMP year. Reviewing and approving a Tier 3 AL during this time is not warranted and is likely duplicative of what will be included in the compliance report.

specifically decline to “approve” the original scope of work in the first instance. The PD should be modified to require the utilities to file one Off-Ramp report as an information-only submittal within six months of the final decision approving the WMP, to be circulated to the service list at the time it is submitted to SED, with the ability for parties to submit Comments to SED on the report. SCE believes this process would be significantly more efficient, transparent, and inclusive of stakeholder input.

10. Future WMPs

SCE appreciates the Guidance PD’s direction to begin planning for the 2020 WMP in 2019. The Guidance PD includes three specific post-decision actions that the respondents are to complete. While SCE supports the three requirements, SCE provides necessary context and recommends a few changes to the language in the PD.

The first two requirements in the Guidance PD are regarding filing two separate Tier 3 Advice Letters (ALs). The first AL consists of a list of data the utilities collect, the data collection systems utilities use, ideas and opportunities to collect new areas of data, a schedule for collecting and using the data, as well as process for making such data available to other parties and stakeholders to improve risk identification and assessment of the effectiveness of wildfire mitigation efforts.³⁶ The second AL consists of proposing additional output-based performance metrics that are intended to improve evaluation of the effectiveness of the approved WMP at mitigating catastrophic wildfires. SCE supports both requirements but recommends certain modifications to the procedural and timing requirements. First, the requested information in both ALs does not rise to any Tier-level AL matter requirement, let alone matters reserved for Tier 3 filings. SCE believes these AL requirements are more appropriately designated as information-only submittals consistent with GO 96-B. The information requested in both ALs should be provided in a report to SED. Parties should then be given the opportunity to submit Comments on the report to SED. Respondents could then respond to those Comments, as applicable, and SED could use this information to begin the metric discussion in early fall 2019. The purpose of these two ALs is to provide SED, parties and stakeholders with additional information prior to SED leading a robust process, as discussed in the Metrics, Monitoring and Reporting section above, to improve data tracking and performance metrics for the 2020 and subsequent-year WMPs. It is not clear

³⁶ SCE notes that depending on any new data that should be collected, setting up new systems, processes and controls could be a multi-year effort to develop and operationalize.

why the Commission would need to review and authorize information that will essentially be comprised of data elements, databases, recommended improvements, and setting up performance metrics. If there is some relief the PD had in mind, it should clearly state what relief the utilities should be seeking through such Tier 3 AL filing.

A Tier 3 AL would also likely delay SED's ability to initiate the metric process in early fall 2019 given that, once filed, there is roughly a 30-day protest period, Staff would then have to develop and issue a Draft Resolution, parties would file Comments and Reply Comments and the Commission would need to wait 30 days to vote on it. The AL requirements clearly fit more in-line with an information-only submittal as opposed any AL Tier filing. If the intent of the proposed Tier 3 designation is to allow party and stakeholder feedback, this could be done by directing parties and stakeholders to send comments on these reports to SED prior to the commencement of the metrics process in early Fall 2019.

Second, SCE proposes that these two AL be combined into a single information-only submittal report. Data collection and metrics are closely linked, and it is more efficient to discuss them in the same report. To this end, the proposed data collection AL also strongly recommends that utilities consult with presenters at the Wildfire Technology Innovation Summit, yet would provide less than 30 days to assemble and describe the data and data collection methods and conduct this consultation.³⁷ Setting up contracts with new vendors takes several weeks if not longer. As such, the two ALs should be combined, designated as an information-only submittal, and be due by July 30, 2019, which should allow ample time for parties and stakeholders to review and provide their feedback to SED prior to the start of the metric development process.

The third requirement is for the large IOUs to lead a meet-and-confer process for the 2020 WMP prior to August 30, 2019. SCE supports such a process but requests two changes. First, SCE recommends the Commission direct SED to lead this process. SED is in a better position to act as the neutral arbiter between parties to attempt to reach consensus on better approaches and methods for the 2020 WMPs. SCE supports the filing of a report summarizing the results of this process. Second, SCE recommends a series of workshops as opposed to "meet-and-confer" sessions. Various parties made

³⁷ SCE also requests that the requirement to consult with presenters at the Wildfire Technology Innovation Summit be removed as several presenters were from utilities and traveled as far away as Australia. Such a requirement for utilities to seek consultation from a limited pool of experts is not warranted and would place utilities in an unfavorable position to compete for services when other experts can satisfy the requirement. Moreover, being an expert on certain technologies does not make them experts in wildfire risk reduction data analysis as a whole.

several recommendations for what should be included in the next WMPs. However, the PD does not address all of these, nor does it provide a process for determining what should be included in the next WMP. The contemplated meet-and-confer process seems to be more procedural- and schedule-focused, rather than focused on content of the WMPs. Instead, SCE believes a more productive and appropriate process would be a series of workshops conducted in August 2019 to attempt to gain consensus for WMP timing, discovery, content and process improvements. SED successfully led the three workshops from the 2019 WMP cycle in February 2018, and SCE believes it should also lead a series of workshops in August 2019 to commence the planning for the 2020 WMP.

II.

CONCLUSION

SCE appreciates the opportunity to submit these Opening Comments on the Guidance PD and looks forward to working with the Commission and all stakeholders in a constructive process regarding future WMP development and approvals.

Respectfully submitted,

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May 20, 2019

Appendix A

Appendix A

Conclusions of Law

3. SB 901 does not provide that preclude the Commission from determining that approval of a WMP is informative regarding ~~dispositive of~~ whether the WMP filer acted reasonably and prudently when the filer seeks recovery of WMP-related costs. Here, we exercise that existing discretion and authority to conclude that, as a matter of law, substantial compliance with the metrics set forth in the utility-specific approved WMPs is equivalent to a finding that the utilities prudently managed their respective systems in regards to mitigating wildfire risk, and that such a determination is informative and relevant when considering future requests for cost recovery for the expenditures necessary to fund those approved activities and programs.
4. While recognizing that outcome-based metrics are largely outside of the utilities' reasonable control, SB 901 requires WMPs to contain metrics that allow the Commission, CAL FIRE and other stakeholders to assess whether the WMPs will over time reduce the risk and impact of catastrophic wildfires.

Ordering Paragraphs

1. All electrical corporations named as respondents may if necessary ~~shall file~~ submit one two ~~Tier 3~~ information-only submittal report to the Commission's Safety and Enforcement Division (SED) Advice Letters entitled "Reports on Possible Off Ramps," describing any concerns about the effectiveness or planned methodological improvements or other prudent modifications of any program in their individual Wildfire Mitigation Plans. The ~~first Advice Letter report~~ shall be filed and served if necessary on the service list for this proceeding no later than 6 months from the effective date of this decision and the ~~second Advice Letter~~ shall be filed and served no later than 12 months after the effective date of this decision. The report Each report shall clearly describe the concern or planned improvement or modifications, contain a specific proposal for action, including if applicable a recommendation to reduce, ~~or end~~ or modify the specific mitigation identified, and include any expert or other authoritative information available received on the efficacy of the mitigation. Parties may submit Comments on this report to SED within 20 days from the date the report is submitted.
2. All electrical corporations shall, by July 30, 2019, ~~file and serve on the service list~~ submit an informational-only submittal report to SED and serve this report on the service list for this proceeding. ~~a Tier 3 Advice letter entitled~~ The report shall be entitled "Data Collection and Results Oriented Metrics for Assessing Wildfire Mitigation Plans" proposing that: a) lists the data the electrical corporation collects that could be useful in assessing the effectiveness of its Wildfire Mitigation Plan (WMP) in reducing wildfire; b) suggests new areas of data collection that could assist in assessing WMP effectiveness; c) proposes a schedule for collecting and using the data for future wildfire mitigation efforts; d) proposes a manner of making the data available to third party researchers for the purposes of improving wildfire mitigation; and e) proposes metrics that assess whether the Wildfire Mitigation Plans are having or will have the desired result – a reduction in catastrophic wildfire. The electrical corporation may make such proposals singly or in combination with other electrical corporations or parties to this proceeding. The

metrics shall not focus on the number of actions taken, but instead on how those actions measurably reduce the risk of catastrophic wildfire.

3. ~~All electrical corporation respondents shall, by June 28 2019, file and serve on the service list for this proceeding a Tier 3 advice letter filing entitled “Data Collection for Wildfire Mitigation Plans” that a) lists the data the electrical corporation collects that could be useful in assessing the effectiveness of its Wildfire Mitigation Plan (WMP) in reducing wildfire b) suggests new areas of data collection that could assist in assessing WMP effectiveness; c) proposes a schedule for collecting and using the data for future wildfire mitigation efforts; and d) proposes a manner of making the data available to third party researchers for the purposes of improving wildfire mitigation.~~ Before making this filing submittal, the electrical corporations shall consult experts in data analysis, including such as presenters at the Wildfire Technology Innovation Summit co-sponsored by this Commission on March 20-21, 2019, to ensure they gather the data in a manner that allows assessment, including using common data gathering methods across all respondent electrical corporations. The filing report shall include the results of this consultation. Parties may submit Comments on this report to the SED within 20 days from the date the report is submitted.

4. On or before August 30, 2019, SED ~~respondent electrical corporations~~ shall convene a series of workshops ~~meet and confer session~~ with the parties to this proceeding and other interested stakeholders for the purpose of initiating the 2020 Wildfire Mitigation Plan (WMP) process. The workshops ~~meet and confer session~~ shall include discussion of: a) the timing of WMP filing, including whether to stagger large investor owned utility filings and those of the small and multijurisdictional utilities; b) discovery and data exchange in 2019 that will assist stakeholders in assessing and commenting on the WMPs; and c) other process improvements to reduce the time constraints faced during this proceeding to date.

5. The electrical corporations shall file and serve a report on the service list for this proceeding ~~on this meet and confer session~~ summarizing the results of the workshops ~~meet and confer process~~. This report shall include a description of all ~~other~~ parties’ input, and include recommendations that reflect both the electrical corporations’ and parties’ suggestions for next steps. The report shall be filed and served no later than October 1, 2019.

6. The series of workshops ~~meet and confer process~~ described in the previous ordering paragraphs shall not be governed by the Commission’s settlement rules; that is, it should be open to all interested in attending, and not confidential.

8. In order to comply with Public Utilities Code Section 8386(c)(19)(C), future Wildfire Mitigation Plans must include a discussion of how the utility evaluates the effectiveness of routine inspection programs developed in accordance with existing regulations such as the Commission’s infrastructure inspection requirements in General Order (GO) 165. ~~At a minimum, the discussion shall detail the number of each type of inspection conducted, the cost of each type of inspection, and a listing of the top five violations or hazards identified by each inspection program, including its location and GO 95, Rule 18 priority level rating.~~

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

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

R.18-10-007

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) OPENING COMMENTS ON GUIDANCE PROPOSED DECISION ON 2019 WILDFIRE MITIGATION PLANS SUBMITTED PURSUANT TO SENATE BILL 901** on all parties identified on the attached service list(s) R.18-10-007. Service was effected by one or more means indicated below:

- Transmitting the copies via e-mail to all parties who have provided an e-mail address.
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by U.S. Mail to the offices of the Assigned ALJ(s) or other addressee(s).

**ALJ Peter V. Allen
ALJ Sarah R. Thomas
California Public Utilities Commission
Division of Administrative Law Judges
505 Van Ness Avenue
San Francisco, CA 94102**

Executed on **May 20, 2019**, at Rosemead, California.

/s/ Edith Leon

Edith Leon
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California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION

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FILER: CPUC
LIST NAME: LIST
LAST CHANGED: MAY 17, 2019

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