

June 15, 2020

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California Wildfire Safety Advisory Board  
300 Capital Mall, 5<sup>th</sup> Floor  
Sacramento, CA 95814

**SUBJECT:** Southern California Edison's Comments on WSAB's  
Recommendations on the 2021 Wildfire Mitigation Plan Guidelines,  
Performance Metrics, and Safety Culture.

Dear Chair, Vice Chair, and Board Members,

Southern California Edison (SCE) hereby submits its comments in response to the Wildfire Safety Advisory Board's (WSAB) June 2, 2020 Draft Recommendations on the 2021 Wildfire Mitigation Plan (WMP) Guidelines (Draft Recommendations).

## **OVERVIEW**

SCE appreciates the opportunity to comment on the WSAB's Draft Recommendations. 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 should continue to be reasonable, predictable and timely. The Draft Recommendations were generally constructive and, if followed, may facilitate and improve the development of utility WMPs. However, several of the recommendations may be problematic and may run counter to or create ambiguity relative to existing law for the goal of improving utilities' wildfire mitigation effectiveness. These issues are among the first recommendations described in further detail below.

## **COMMENTS**

### **A. The Prudent Operator Standard, Recommended to be Added as a Prerequisite to Safety Certification, Is Unnecessary And Conflicts With Existing State Law (Recommendation 4.1)**

The WSAB recommends developing a “Prudent Operator” standard, which would set an acceptable level of electric operation risk and establish the risk reduction that a prudent operator should assume so that utilities can design their systems accordingly. The WSAB observes that such a standard would allow utilities to raise the thresholds for implementing public safety power shutoffs (PSPS) events. The WSAB further recommends that the new standard be a condition for safety certification.

SCE appreciates the WSAB’s intent behind the Prudent Operator standard. However, requiring a new standard as a condition of utilities receiving a safety certification conflicts with state law. Public Utilities Code Section 8389(e) sets forth the universe of very specific conditions for obtaining a safety certification. Developing and using a Prudent Operator Standard is not among them.

The Commission through the WMP and PSPS proceedings is already providing significant guidance, review, approval and oversight of activities the utilities must undertake to adequately mitigate wildfire risk and reduce the frequency, scope and impact of PSPS. Utilities are demonstrably complying with these requirements as well.

Establishing a new Prudent Operator standard/requirement would also inject a substantial amount of uncertainty into the safety certification process. For example, it is unclear how the Wildfire Safety Division (WSD) would determine the acceptable threshold of risk and whether a utility has met that threshold. It is also unclear whether the WSD would subject the utility to retrospective scrutiny to determine if it had met the Prudent Operator standard on a specific circuit-segment.

Clarity and consistency of the safety certification process is imperative. Accordingly, establishing such an extralegal condition could delay the issuance of utilities’ safety certifications. This in turn would unnecessarily jeopardize utilities’ access to the Wildfire Fund. Thus, while well-intentioned, a new Prudent Operator standard could undermine the very purpose of Assembly Bill (AB) 1054, which was to support the credit worthiness of electrical corporations and provide “a mechanism to attract capital for investment in safe, clean, and reliable power for California at a reasonable cost to ratepayers.”<sup>1</sup>

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<sup>1</sup> AB1054 at Section 1.

## **B. The WSD Should Not Create Position Descriptions For Utility Boards Of Directors (Recommendation 5.2)**

The WSAB recommends that the WSD help create position descriptions for utility boards of directors with relevant safety language. However, this is unnecessary due to the safety certification requirements of AB 1054 and SCE's existing robust governance practices and could interfere with the board's fiduciary duties under California law.

AB 1054 already requires SCE to maintain an annual safety certification that, among other things, demonstrates that SCE has established a board safety committee with relevant safety experience and has established board-level reporting to the CPUC on safety issues. SCE has met the requirements for a safety certification, which was issued by the CPUC on July 25, 2019, and will be required to demonstrate the board's safety experience and board-level reporting annually to maintain its safety certification in accordance with AB 1054. Therefore, the WSAB's recommendation that the WSD help create position descriptions for SCE's board is not necessary to ensure that the SCE board carries out its fiduciary duties related to SCE's safety mission.

SCE agrees that safety experience is a critical qualification for the board to appropriately oversee SCE's safety efforts. However, safety experience is not the only important qualification to consider when evaluating the skills needed on the SCE board, and the SCE board should maintain flexibility to determine the type of safety and other experience necessary or appropriate for the SCE board at any given time. Therefore, the WSD should not infringe on the SCE board's fiduciary duties under California Corporations Code Section 309 to determine the specific experience, skills or qualifications represented on the board. The SCE board, and in particular its Nominating/Corporate Governance Committee comprised solely of independent directors, is well-positioned to evaluate the needs of the board and new director candidates and already uses a skills matrix in its evaluation.

Finally, the WSAB's observation that the position description for utility boards should align with the matrix of qualifications set forth in PG&E Bankruptcy Proceeding (I.19-09-16) does not account for differences in the structure, business and governance of the three large investor-owned utilities (IOUs). These differences may result in different position descriptions for each utility board that are tailored to the needs of the specific IOU. PG&E has filed for bankruptcy and is subject to additional regulatory and governance requirements that are not applicable to SCE. Those provisions were imposed on PG&E after a lengthy safety investigative proceeding that was specific to the facts of PG&E's history and governance. SCE believes it would be inappropriate to impose additional governance provisions on SCE without evaluating SCE's particular structure, business and governance. For example, SCE has maintained a skills matrix with safety experience as an important qualification for many years. The CPUC's implementation of a matrix of board qualifications for PG&E under I.19-09-16 should not be applied to SCE for the reasons stated above.

SCE is a leader in corporate governance practices and compares favorably to other utilities and public companies in third-party governance scores, such as Institutional Shareholder Services' Governance QualityScore. SCE's proxy statement, filed annually with the SEC and most recently on March 13, 2020, describes in detail SCE's governance practices, including its commitment to safety, director selection process, and the experience, skills and attributes of its directors.

**C. The WSD's Role Should Not Extend Beyond Wildfire Mitigation (Recommendations 5.1 and 5.4)**

Among the WSAB's observations and recommendations is the general theme that the WSD's role should be extended beyond wildfire mitigation. For example, the WSAB recommends planning for compounded catastrophes such as COVID-19 as well as other black swan-type events. WSAB also recommends that the WSD be involved in the effectiveness of the utilities' processes and post-accident evaluation.

While these are all important issues for the CPUC and the state to consider, they are beyond the intended scope of the WSD. For example, the CPUC already has the Safety Enforcement Division for safety oversight of electric facilities and the Safety Policy Division to provide support on safety policies. As provided in Public Utilities Code Section 326, the WSD's role centers around wildfire mitigation. Even the section that provides for the WSD's role in reviewing safety requirements for electrical transmission and distribution infrastructure relates specifically to wildfire mitigation. The WMPs are already broad and complex, adding scope will have adverse impacts given resource constraints and timelines.

**D. RSE Analysis Is Not Appropriate For All Mitigation Measures (Recommendation 2.3)**

The WSAB recommends that the 2021 WMP Guidelines require utilities to complete an RSE analysis for each mitigation measure. RSE analysis, while a helpful tool, is not the only tool to measure a mitigation's appropriateness. In its WMP, SCE did not provide RSEs for initiatives that fell into the following categories:

- 1) Pilot projects: No RSE was developed for these initiatives because their deployment is by design limited in scale and SCE is still determining their level of mitigation effectiveness, which is the objective of the pilots. The entire purpose of a pilot project is for SCE to collect validation data to judge whether it is effective at reducing wildfire risk, can be operationalized, and is cost-effective. In other words, neither the "risk" nor the "spend" calculations would be informative when evaluating whether or not to embark upon a pilot program. As such, requiring SCE to develop an RSE for pilots is obviating the very reason for a pilot in the first place. A

pilot by definition is a way to test ideas. Pilots can provide information on how effective broad implementation of the pilots could be in reducing risks, and therefore can help with RSE calculations for future implementation activities after the pilots are complete. Examples include distributed fault anticipation and meter alarming for downed energized conductor.

- 2) Traditional programs: No RSE was developed for these initiatives because it is difficult to measure the incremental impact of a preexisting program. To determine the incremental amount of risk reduced by a specific initiative, there must be a baseline level of risk to start from. For example, SCE recently implemented its Hazard Tree Management Program (HTMP). SCE had data on how many tree-caused circuit interruptions (TCCIs) occurred as well as their cause (e.g., palm frond, tree fall-in, etc.) prior to implementation of the HTMP and thus could estimate how much incremental risk the HTMP could mitigate. On the other hand, SCE has been performing “vegetation management to achieve clearances around electric lines and equipment” for decades. SCE does not have data on how many TCCIs occurred prior to SCE performing this traditional program, cannot estimate how many TCCIs might occur if line clearance activities are not continued, and thus cannot develop an RSE for it. This type of program is done for compliance reasons and the risk/benefit analysis is embedded in the establishment of the guidance and should be evaluated by the respective regulator. Even if SCE were to derive an RSE without data, the end product would have minimal probative value. No matter what RSE was developed for this initiative, SCE would continue to perform vegetation management to achieve clearances because it is required to do so. Similarly, SCE would not forgo any activity solely due to the relative highness or lowness of a theoretical RSE for “vegetation management to achieve clearances around electric lines and equipment” and the primary focus of SCE’s 2020-2022 WMP is to detail the wildfire mitigation activities SCE is performing that are incremental to its traditional baseline of activities that it has been required to perform for years.
- 3) Enabling activities: A separate RSE was not developed for initiatives that do not directly reduce the risk of wildfire, but rather directly enable a wildfire initiative that does reduce wildfire risk. An example of an enabling activity is de-energization notifications. They do not directly reduce the risk of wildfires but they directly support effective execution of PSPS, which do reduce wildfire risk. Accordingly, the cost of de-energization notifications is taken into account when developing the RSE for PSPS. In other words, the RSE for de-energization notifications is subsumed within the broader RSE for PSPS.
- 4) Supporting activities: No RSE was developed for these initiatives because they do not directly reduce the risk of wildfire or directly enable any specific wildfire mitigation activity. To be clear, an RSE cannot be developed if there is no reduction to a risk driver. However, a utility must

undertake these foundational activities. For example, an “adequate and trained workforce for service restoration” or “customer support” in emergencies do not directly reduce any specific risk driver for wildfires; yet are essential services that a utility must provide to its customers.

Although SCE understands the WSAB’s observation that RSE analysis “will enable the quantification of the most efficient asset allocation required to solve the risk reduction needed” it is important to remember the primary objective of WMPs is to review the activities included in each utility’s WMP and approve the plan. Cost-effectiveness is an important factor to review but is only as useful as the accuracy of the underlying data and assumptions. A common thread among initiatives for which SCE did not compute an RSE is unavailability of sufficient data to estimate risk reduction benefits. While all risk analyses rely on some judgment by Subject Matter Experts, for an RSE to have any real usefulness, it must be grounded in at least some validation data. Without sufficient data, an RSE may be useless at best and potentially counterproductive to the extent that it presupposes outcomes.

As such, it is factually erroneous that each activity in SCE’s WMP can be analyzed for risk reduction using the S-MAP risk model. The WSD appears to recognize this distinction in its revised resolution WSD-002, stating that, “The WSD agrees that wildfire mitigation measures are initiatives designed to reduce the risk of utility-caused ignition” and that it “will work with electrical corporations to determine whether there are some initiative categories that should be analyzed in a different manner from RSE.” While RSEs that can be appropriately calculated may be helpful to inform decisions, they are also not the sole factor in those decisions. As such, SCE recommends that the WSD, WSAB, utilities, and stakeholders collaborate on identifying the best way to determine the most appropriate mitigations for each circuit section.

#### **E. Public Utilities Code Section 3280(f) Should Be Amended To Better Align With The Renewal Date Of Utilities’ Insurance Policies**

SCE wishes to bring to the WSAB’s attention an issue with the language in AB 1054 that could potentially result in a utility both exhausting its insurance coverage and being ineligible for the Wildfire Fund through no fault of its own. AB 1054 defines “Eligible Claims” as those paid from the Wildfire Fund resulting from wildfires incurred by a utility aggregated over a “calendar year” that exceed \$1 billion or the amount of insurance required by the Fund Administer to be held by the utility.<sup>2</sup> This provision does not align with the renewal dates for the utilities’ wildfire insurance programs, which are not on a calendar year schedule. Thus, it is possible that a participating utility’s insurance could be exhausted by a fire that occurs in one calendar year with the result that the utility would be both uninsured and not eligible for the Wildfire Fund in the next calendar year until the utility’s renewal date.

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<sup>2</sup> Public Utilities Code Section 3280(f).

To align this provision with the utilities' programs, the participating utilities propose replacing the word "calendar" in section 3280(f) with the word "policy" so that Eligible Claims are aggregated over each utility's "policy year." Making this change will avoid several challenges related to the utilities having to re-align their renewal dates to the calendar year. In such case, all the utilities would be in the market at the same time competing with each other and the Wildfire Fund itself for limited capacity, leading to reduced limits and higher prices. Second, the utilities would be in the market during hurricane season, which also impacts capacity and pricing. Third, many reinsurance treaties expire at year end meaning that traditional insurance companies do not know what capacity is available to deploy until later in the first quarter creating uncertainty also leading to limited capacity and higher prices. As such, SCE would appreciate the WSAB adding this issue and identified solution to its recommendations.

## **STRUCTURAL RECOMMENDATIONS TO THE 2021 WMP GUIDELINES**

### **A. SCE Supports An Extended Timeline For WMP Submission And Streamlining The WMP Data Reporting Requirements (Recommendations 1.3 and 1.4)**

SCE appreciates the WSAB addressing the structural issues associated with the WMP process, especially given the resource and time constraints. SCE is generally supportive of the WSAB's structural recommendations to the WMP Guidelines, specifically the recommendations of giving the utilities four months to prepare the WMP as well as streamlining the reporting requirements for the WMP.

With regard to the four-month timeline, the WSAB correctly notes that the utilities were under an enormous amount of pressure to generate the 2020 WMPs in less than eight weeks. SCE supports a longer timeline to respond to finalized WMP Guidelines but notes that the WSD has added a *new* requirement of updating the information provided in the 2020 WMP three months ahead of the 2021 WMP update submittal.<sup>3</sup> This would essentially require the utilities to file two WMPs for the same time period which are bound to have different information and would place an unnecessary onerous workload on the utilities to complete table data requirements in the first submittal within one month. Additionally, the data provided in the earlier version will be significantly rushed and likely not incorporate additional new requirements the WSD might establish, will not have the benefit of year-end 2020 recorded information and there will not be sufficient time to incorporate the results of data and analytical enhancements SCE has undertaken since the 2020 WMP. Therefore, it will have limited value in giving WSD the head start it desires in reviewing the 2021 WMP update, but will double the utilities' efforts.

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<sup>3</sup> Resolution WSD-002, section 5.8.

SCE wholeheartedly agrees with the WSAB that the WSD must “set submission schedules that promotes the success of all parties.”<sup>4</sup> While the WSAB recommends that the CPUC should target October for a final decision on the Guidelines, SCE notes that it should be September (or early October at the latest), to allow for conformance with the safety certification timelines of submitting annual WMPs or WMP updates by early February and approval 90 days thereafter.

SCE strongly supports the WSAB’s recommendation of streamlining the data reporting requirements of subsequent WMPs, as well as further collaboration between WSD and utility staff on how data will be used. Further dialogue on what data is needed and how it is used will benefit both WSD and utilities, as substitutes can be explored for difficult-to-obtain data.

## **RECOMMENDATIONS FOR 2021 WMP GUIDELINES THAT GENERALLY ALIGN WITH DRAFT GUIDANCE RESOLUTION WSD-002**

### **A. The Impact Of PSPS To Customers Should Be Considered When Implementing A PSPS Event, But Developing An RSE May Not Be Practical In The Short Term**

SCE recognizes that the implementation of a PSPS event has a cost impact upon its customers. However, it is unclear whether building those impacts into an RSE analysis for PSPS is a worthwhile endeavor. In the Commission-approved Resolution WSD-002 (2020 WMP Guidance Resolution), it states, “that RSE as an evaluation tool of PSPS is extremely limited in utility. Therefore, electrical corporations shall not use RSE as a means of justifying or evaluating the efficacy of PSPS as a mitigation measure.” Even beginning to incorporate PSPS impacts to customers into an RSE analysis would require a stakeholder process to standardize the analytical approach. This will be essential to ensure consistency between utilities. Additionally, how PSPS impacts are quantified needs to be agreed upon so that only primary impacts are included consistent with how risk is quantified for other risk events instead of trying to account for derivative and societal impacts that have inherent uncertainty associated with quantification. As such, an attempt to develop a meaningful RSE for PSPS will take significant time and will likely not be ready for the 2021 WMP.

### **B. Setting Minimum Qualifications For Electrical Inspectors is Unnecessary And Can Be Counterproductive (Recommendation 2.2)**

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<sup>4</sup> Draft Recommendations at p. 16



SCE agrees with the need for properly qualified and trained asset inspectors. However, qualified electrical workers (QEW) is a defined term, which in general is a person who is permitted to work on or near exposed energized parts. Though SCE used QEWs for its Enhanced Overhead Inspection (EOI) program in 2019, and engineers and QEWs evaluated the images from aerial inspections to determine issues for its EOI program, the circumstances were unique during the first cycle of comprehensive inspections across all of SCE's HFRA within a very condensed timeframe. It is not practical or cost-effective from a resource availability and cost perspective to utilize QEWs for all transmission and distribution inspections on an ongoing basis. SCE prefers allocating QEWs for construction, maintenance, and repair while providing inspectors with adequate training to perform their job. It is important for utilities to maintain flexibility in resource allocation without compromising safety, quality and costs.

SCE undertakes rigorous classroom and field training including job shadowing for the electrical equipment and structure inspectors. Since 2019, SCE has expanded its training program for inspections going above and beyond General Order 95 to emphasize inspection requirements, equipment condition recognition, and electrical risk mitigation. SCE continues to refine its inspection training programs based on input from field worker and quality control inspectors.

SCE can share information about the counts, qualification, and training of its electrical inspectors with WSD and the WSAB, but does not believe it is necessary to set minimum qualifications. There are differences among how different utilities manage their construction and operational practices and utilities should be afforded the flexibility to determine how they plan, manage, and execute their work including the number of inspectors, their qualifications, training provided, and the allocation of work between qualified inspectors and QEWs.

Therefore, SCE agrees that inspectors should be "qualified," but not necessarily that they be "qualified electrical workers."

### **C. SCE Supports The WSAB's Recommendation Of A More Streamlined Process To Update The CPUC Fire-Threat Maps**

SCE agrees with the WSAB that high fire threat maps should be more representative of current conditions. Updates that are more frequent than the current pace are warranted. However, any update of fire maps is a significant labor and resource-intensive task as explained in SCE's pending Petition for Modification of D.17-12-024. As such an annual update is likely too frequent and demanding. A three- to four-year interval between map updates would strike a better balance.

### **D. Data Standardization Should Take Into Account Utility Limitations**

While SCE understands and supports the goal of data standardization, such efforts should consider limitations presented by each utility's systems. For example, certain categories of data that may be easily accessible to some utilities may require extensive manual processing or conversions for other utilities. As such, before standard data taxonomy and schema are adopted, SCE urges the WSD to conduct outreach with the utilities to determine what is achievable for the utilities while being useful to the various agencies and stakeholders.

## **RECOMMENDATIONS THAT GO FURTHER THAN RESOLUTION WSD-002**

### **A. SCE Does Not Only Rely On Peer-Reviewed Scientific Works For Its Wildfire Mitigation Decisions**

SCE's wildfire mitigation strategy is based on the foundation of the fire science first and foremost and welcomes science-based feedback on its risk modeling and wildfire mitigation initiatives. Peer-reviewed scientific literature and associated scientific works, when available, inform SCE's decisions. This is an area that will continue to evolve as the body of science exploring the complex mechanisms of system interactions with the environment leads to ignitions, how ignitions become fires, and the expansion of initial fire to large wildfire grows. However, SCE does not only rely on peer-reviewed, published scientific studies to make wildfire mitigation decisions. SCE conducts benchmarking with other utilities, including international utilities that have evolved their respective wildfire mitigation programs with rigorous review by the scientific communities. SCE also conducts pilot studies and engineering assessments to further inform its decisions. SCE strives to continuously improve the science of wildfire mitigation and looks forward to partnering with industry stakeholders to advance our expertise in this area.

### **B. SCE Welcomes Sharing Data With Limitations**

While SCE supports sharing data with other organizations and stakeholders to learn from and utilize, what data is to be shared and what form it will be shared in should be determined through a collaborative process with the utilities. Some data may present physical and cybersecurity issues if widely disseminated. For example, SCE recommends that asset specific risk assessment modeling data be excluded due to Critical Energy Infrastructure Information requirements and federal critical infrastructure protection protocols. Other data may be the intellectual property of SCE's vendors and/or customized for SCE's service territory, and therefore proprietary. SCE also has liability concerns regarding external users making decisions, recommendations, assumptions, and conclusions based on SCE's weather and fire modeling information.

And while SCE is not opposed to a federated data repository, SCE cautions that the specifics must be carefully considered. For example, who will administer and maintain such a database? Development and operation of such a system is not within the utilities' core responsibilities and would be better served by another entity. What type of cybersecurity protocols will be in place? As mentioned above, extremely sensitive information may be stored on such a system and may be subject to North American Electric Reliability Corporation Critical Infrastructure Protection restrictions. Will some of the data in the depository be available in other locations? The utilities provide copious amounts of data pursuant to the WMP and other CPUC proceedings. Providing the same information to a separate database could lead to conflicts if data in one location is updated and the other is not. As such, the concept of a federated data repository may seem promising but requires much more deliberation.

### **C. The WSAB's Vegetation Recommendations Need More Context**

The WSAB recommends that "all utilities coordinate and complete an ongoing study, similar to what is ordered in WSD-005, that would ensure vegetation management practices align with best available science." WSD-005 requires the three investor-owned utilities (IOUs) "to develop a consensus methodology for how to measure post-trim vegetation clearance distance impacts on the probability of vegetation caused ignitions and outages." The WSD's requirement has a much narrower focus – impacts of post-trim vegetation clearance distance – than the WSAB's recommendation of a study of "vegetation management practices," which can encompass quite a few activities. SCE supports collaboration with the other IOUs on best practices, but a formal study requires a formal scope. Given the wide variety of practices as well as the differences in vegetation, weather, and topology among the IOUs' service territories, such a general study may not be practicable.

With regard to the WSAB's recommendation that utilities describe how it assesses the tradeoffs between vegetation fuel load versus flammability, SCE's vegetation management strategy generally focuses on preventing vegetation contact with SCE facilities, regardless of flammability, to prevent the occurrence of ignition or ignition-causing sparks. For example, SCE generally does not remove shrubs that will not reach a height to touch or contact electrical lines (it does remove such vegetation around its poles). While removing all vegetation in utility rights-of-way may have value through reduction of fuel load, it may also have unintended consequences (erosion, loss of habitat) in addition to increased costs.

Further, SCE assumes from context that WSAB's recommendation that all utilities identify species within a genus applies only to at-risk species. While SCE can train its pre-inspectors to recognize at-risk species, it is far more difficult to identify every species of the approximately million trees in SCE's inventory. While the distinctions among species may be obvious to scientists, generally routine vegetation management pre-inspectors are not scientists or ISA-certified arborists. While a utility with a much

smaller service territory might use ISA-certified arborists for assessing trees for compliance trims, even though it is not required, SCE only uses ISA-certified arborists for assessments of its hazard tree program, as required by the Commission.

### **RECOMMENDATIONS ON PERFORMANCE METRICS**

As explained above, SCE disagrees with the Board's recommendation that the 2021 WMP Guidelines require the development and use of a new "Prudent Operator" standard or threshold. SCE does support many of the Board's other recommendations regarding performance metrics including establishing a process to work with the WSD and stakeholders in the development of the 2021 WMP Guidelines. Also, pursuant to D.20-03-004, SCE is already required to establish progress metrics for community engagement activity and effectiveness.

### **RECOMMENDATION LIKELY NEEDING LEGISLATIVE OR GUBERNATORIAL ACTION TO IMPLEMENT**

SCE does not take issue with the WSAB's recommendation that the WSD should remain at the CPUC. It is important that review of the IOUs' WMPs and overall safety be well coordinated, which may be better facilitated under the same regulatory structure. Bifurcating regulatory requirements could increase regulatory costs. SCE supports regulatory oversight that is reasonable, meets all safety requirements, and most efficiently and timely achieves safety objectives.

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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Carla Peterman  
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Southern California Edison

cc: Caroline Thomas Jacobs, Director Wildfire Safety Division, CPUC  
Jaime Ormond, Energy Division, CPUC  
Katherine Stockton, Executive Division, CPUC