

06/23/2021

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California Wildfire Safety Advisory Board
300 Capital Mall, 5th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's and San Diego Gas and Electric Company's Joint Comments on the California Wildfire Safety Advisory Board's Draft Recommendations on the 2022 Wildfire Mitigation Plan Guidelines, Performance Metrics, and Safety Culture Assessment

Dear Chair, Vice Chair, and Board Members,

Pursuant to the California Wildfire Safety Advisory Board's (Board or WSAB) Mission, Work Plan, and Review Principles for the Wildfire Mitigation Plans (WMPs), Southern California Edison (SCE) along with San Diego Gas and Electric Company (SDG&E) jointly submit their comments in response to the Board's June 17, 2021 Draft Recommendations on the 2022 Wildfire Mitigation Plan Guidelines, Performance Metrics, and Safety Culture Assessment (Draft Recommendations).

INTRODUCTION

SCE and SDG&E appreciate the efforts that the WSAB has undertaken to further develop guidance and recommendations for the utilities' WMPs. SCE and SDG&E recognize the benefits of improved alignment and transparency in wildfire mitigation decision-making. But the WSAB's recommendations would create significant new requirements without consideration of the feasibility or any potential benefits that the new requirements would create. Before adopting the WSAB's recommendations, SCE and SDG&E recommend the Wildfire Safety Division (WSD) include these topics in workshops with stakeholders to further ascertain the feasibility, costs, and benefits associated with implementing these recommendations. SCE and SDG&E do not discuss each WSAB recommendation in these Comments, but include several examples below that require additional consideration.

RISK ASSESSMENT RECOMMENDATIONS REQUIRE FURTHER EVALUATION

WSAB made several recommendations related to utilities' risk modeling approaches and reporting. WSAB has commented that its recommendations on "[t]his approach to the presentation of risk assessment is similar to the approach taken in scientific journals."¹ WSAB further recommends a peer review process to evaluate utility risk modeling, which would include a review of proprietary and confidential data.² SCE and SDG&E note that we have each made significant advances in the granularity and sophistication of our risk modeling capabilities, which address key drivers of both wildfire and PSPS. While we welcome a more in-depth discussion based on WSAB's input, we are unclear how these proposed changes would result in practical benefits. Additional analytical sophistication should only be undertaken if it is expected to provide further practical benefits in reducing risk, managing constrained resources, or relaxing regulatory requirements which may be outdated in terms of risk reduction. We also note that WSAB's proposals would significantly increase the scope, cost, and timeframe of risk modeling activities and the associated requirements for WMP submissions. We strongly recommend that these changes not be adopted without further discussion with WSD, CPUC, utilities, and other stakeholders.

WSAB also recommends the utilities complete a Risk-Spend Efficiency (RSE) analysis for each mitigation at the circuit-segment level, and to treat PSPS as a risk for RSE analysis.³ This recommendation further extends the scope and complexity of RSE analysis and could potentially lead to the need to analyze thousands of RSEs in the WMP. The burden of this analysis may not necessarily provide commensurate benefits. It is also worth noting that the granularity with which RSEs are developed has to be determined based on the use case and application of the analysis. Further thought should be put into if there are any initiatives that warrant such a detailed analysis and whether it would add value. Circuit-segment level RSE analysis will also require additional time and discussion and cannot be achieved within a short timeframe. SCE and SDG&E already consider PSPS as an independent risk and have included PSPS specific mitigations in our plans. Further, as discussed in SCE's Reply Comments regarding the WSD's Revision Notice, SCE continues to assess means to calculate additional RSE's for PSPS-related activities, and developed new RSEs for PSPS-related mitigations such as weather stations that limit PSPS consequence, rather than reduce wildfire risk. SCE and SDG&E also note that these issues are being addressed in the Risk-Based Decision-Making OIR (R.20-07-013).⁴

WSAB recommends that utilities identify each mitigation and their associated risk reductions of PSPS, probability of ignition, wildfire suppression, or PSPS mitigation.⁵ It is important to note quantification of benefits is not feasible for every mitigation activity (e.g., data governance or risk models development do not have quantifiable benefits in

¹ WSAB Draft Recommendations, p. 9.

² WSAB Draft Recommendations, p. 10.

³ WSAB Draft Recommendations, p. 15.

⁴ See, for example, SCE's Reply Comments Regarding the WSD's Revision notice, pp. 2-3.

⁵ WSAB Draft Recommendations, p. 13.

terms of directly reducing ignition drivers/sources). Furthermore, wildfire suppression is not within the utility's control and is not something that utilities can substantially affect through their mitigations. Thus, it is not reasonable to expect the utilities to describe how each mitigation affects wildfire suppression.

WSAB's recommendations, including issues related to risk modeling, RSE calculation, and risks associated with the release confidential data require careful consideration and discussion amongst various stakeholders including the WSD, CPUC, and utilities prior to their adoption. SCE and SDG&E recommend these items be added to upcoming workshops/forums that the CPUC and WSD are leading in R.20-07-013 and the WSD proposed workstream on risk modeling through the WMP process.⁶ Finally, the risk modeling approach should be decided in the Risk OIR to avoid unnecessary conflicts and overlaps.

SOME VEGETATION MANAGEMENT RECOMMENDATIONS ARE OVERBROAD, MAY LEAD TO SIGNIFICANT COST IMPACTS AND/ OR HAVE UNCLEAR BENEFIT

Many of the WSAB's vegetation management-related recommendations could lead to significant cost impacts even while the benefits have yet to be established. An example is WSAB's recommendation that the Guidelines require the utilities to create a shared statewide database of outage incidents related to vegetation.⁷ Prior to requiring the creation of such a database, workshops should be held jointly with the utilities to discuss the benefits, costs, and functionality of such a database. One concern with the recommended database is the level of access to the information, whether the database is public, who has access and for what purposes, and how to restrict access. Providing access to a comprehensive statewide database concerning circuit interruptions raises serious safety and security considerations and protecting such information from cyber criminals and other bad actors should be a significant consideration. Moreover, given the size, diversity, and complexity of California's landscape and vegetation, safe and reliable management of trees in proximity to electrical infrastructure is dependent on varied, multiple, and site-specific conditions that are not characterized only by species. Other considerations include technical feasibility of merging data across the utilities, costs to ratepayers, and whether a shared database provides meaningful benefits relative to the data that is already being collected and tracked by the utilities individually.

WSAB's recommendation that utilities report the use of "herbicides, pesticides, tree growth regulators and other chemicals" including the chemical composition, volume, locations and frequency of application,⁸ is overbroad. SCE and SDG&E can report the

⁶ See Resolution WSD-019 WSD's Draft Resolution Ratifying Action of the Wildfire Safety Division on San Diego Gas & Electric's 2021 Wildfire Mitigation Plan Update Pursuant to Public Utilities Code Section 8386, filed June 10, 2021, pp. 14-21.

⁷ WSAB Draft Recommendations, p. 18.

⁸ WSAB Draft Recommendations, p. 18.

chemical composition of the herbicides that it uses, its program parameters, and general frequency. The joint IOUs note that utilities are already required to report to the respective county on herbicide usage and volume. However, to report on each location, how big the area is, and the volume would require the implementation of new processes and data collection, requiring new costs. As SCE's and SDG&E's activities are already regulated by the Environmental Protection Agency (EPA) and state and local jurisdictions, it is not clear what additional goal would be served by reporting this data in its WMP. At a minimum, SCE and SDG&E recommend discussing this topic at a workshop in order to identify the benefits of this additional reporting.

The WSAB recommends that “[t]he 2022 WMP Guidelines must prohibit the practice of removing healthy trees following wildfire events without some kind of environmental review by an independent ecologist.”⁹ SCE and SDG&E agree that healthy trees should not be removed following wildfire events except in instances where the presence of those trees conflict or pose a potential threat to the safe and reliable operation of electrical infrastructure. Further, SCE and SDG&E both already have well-established processes of undertaking environmental review for tree removals in environmentally sensitive areas and do not believe that an additional level of review from an independent ecologist is necessary. In addition, utilities utilize trained personnel to assess trees, relative risk, and the threat to electrical infrastructure. Utilities follow environmental review and protocols to determine potential impact to their operations, and are subject to all state and federal environmental regulations for species protection. This new additional review requirement would add unnecessary costs, could delay the work to restore service in areas impacted by wildfire events, and should be removed.

The WSAB would require the utilities to “report notices of violation issued by other state agencies as they relate to utility wildfire mitigation programs like vegetation management.”¹⁰ As discussed in SCE's comments on the WSAB's draft recommendations on the IOUs' 2021 WMPs,¹¹ it is unclear how notices of violation issued by other agencies would inform inter-agency coordination, particularly where each agency is tasked with applying the unique governing standards of its agency to the particular facts presented. Furthermore, it would be inappropriate for the WSD to give weight to notices of violation that may be in dispute or otherwise unresolved as to the alleged facts. Thus, the benefits of this recommendation are not clear. Generally, however, SCE and SDG&E have no objection to anyone reviewing applicable notices of violation, which are a matter of public record and are available for review by the WSD.

The WSAB states “2022 WMP Guidelines should require the utilities create tree replacement programs that are larger with a broader scope. The Guidelines should

⁹ WSAB Draft Recommendations, p. 17.

¹⁰ WSAB Draft Recommendations, p. 17.

¹¹ See SCE's Comments on the California Wildfire Safety Advisory Board's Draft Recommendations on the 2021 Wildfire Mitigation Plan Updates for Large Investor-Owned Utilities, filed April 9, 2021, pp. 4-5.

require that utilities to hire or contract with ecologists or fire scientists to provide expert consultation.”¹² Utilities currently offer replacement trees as incentive for the removal of incompatible trees that may conflict with power lines and present an ignition risk. In-kind tree replacement would not be conducive to the safe operation of electrical infrastructure. SDG&E’s current sustainability goals initiative includes a broad expansion of its annual tree planting program and the engagement of customers, communities, agencies, and fire personnel. SCE and SDG&E both have a Right Tree Right Place program which is an industry-accepted approach to disseminating information about tree and landscaping selection.

RECOMMENDATIONS FOR REQUIRING QUALIFIED ELECTRICAL WORKERS (QEW) FOR INSPECTIONS AND INCREASED QUALITY CONTROL FOR NON-QEW INSPECTIONS ARE UNNECESSARY

WSAB recommends the 2022 WMP Guidelines require utilities to require the minimum qualifications of a Qualified Electrical Worker (QEW) for inspections and mitigation efforts.¹³ SCE’s and SDG&E’s Electric System Inspectors (ESI) or Electric Troubleshooters (ETS) must complete extensive training before they perform inspections and any hazards identified by ESI or ETS under the inspection programs are reviewed by QEWs. As SCE and SDG&E have discussed previously, this recommendation is unnecessary, potentially costly for customers, and would likely not yield value over existing processes.

Furthermore, SCE’s and SDG&E’s existing Quality Control (QC) programs for inspections are comprehensive and assure that inspections, including those performed by ESI or ETS, are conducted in accordance with program standards. The QC programs review samples of the inspection data to provide reasonable assurance that the work performed is consistent with standards and codes. The programs provide detailed and regular data-driven feedback to the Overhead Distribution Inspection (ODI) management teams that is used for continuous improvement. SCE and SDG&E also disagree with WSAB’s assertion that “the CPUC requires that all asset inspections be performed and interpreted by QEWs” and that non-QEW inspectors are “unqualified individuals.”¹⁴ Lastly, in light of SCE’s and SDG&E’s thorough ESI and ETS training programs, QEW notification review, and robust QC processes, the WSD should not require SCE or SDG&E to perform additional quality control for inspections.

SAFETY CULTURE ASSESSMENT

The WSAB asserts, without support, that “the pressure to produce can result in some [vegetation management] contractors spending as little time as possible doing the work, taking shortcuts, or disregarding safety rules.”¹⁵ The WSAB recommends that “[i]n the

¹² WSAB Draft Recommendations, p. 17

¹³ WSAB Draft Recommendations, p. 21.

¹⁴ See, for example, GO 174, Rule 30.2 which states, “Inspections shall be performed by persons who, by reason of training, experience and instruction, are qualified to perform the task.”

¹⁵ WSAB Draft Recommendations, p. 25.

2022 Safety Culture Assessments, the WSD should evaluate whether production-based pricing structures” lead to “more accidents compared to hourly pricing structures.”¹⁶ WSD has already undertaken a thorough safety culture assessment process. Any changes to this process, and especially any new requirements, should be based on data and analysis, not presumptions. SCE and SDG&E already perform detailed root cause analyses and take corrective actions for safety incidents. Contractors’ safety performance is part of the selection process. Regardless of pricing mechanism, SCE’s and SDG&E’s expectation is that contractors follow the same safety practices. SCE and SDG&E also conduct quality control of respective contractors’ work to ensure all construction and safety standards are met. Therefore, additional requirements for analysis or operational practices are unnecessary.

CONCLUSION

SCE and SDG&E appreciate the opportunity to submit its comments on WSAB’s Recommendations and proposes that the WSAB revise its final recommendations taking into consideration its comments herein. If you have any questions, or require additional information, please contact us at michael.backstrom@sce.com or Laura Fulton at LFulton@sdge.com.

Sincerely,

//s//

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¹⁶ WSAB Draft Recommendations, p. 25.