

**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

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE  
(PROPOSED) DECISIONS ON INDIVIDUAL UTILITIES 2019 WILDFIRE MITIGATION  
PLANS PURSUANT TO SENATE BILL 901**

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## SUBJECT INDEX OF RECOMMENDED CHANGES

- The SCE PD’s requirements regarding non-CPUC-tiered High Fire Risk Area (HFRA) designations should be modified to ensure an efficient and effective process to amend the Commission’s High Fire Threat District (HFTD) maps.
- The SCE PD’s discussion on “system hardening” work should be clarified to reflect SCE’s ongoing continuous improvement risk-informed prioritization efforts.
- The final decision should not incorporate the SCE PD’s proposals regarding enhanced vegetation management as those issues are being actively litigated in a separate proceeding.
- Incremental costs associated with a contemplated state-wide public education and outreach campaign for de-energization events are authorized to be recorded in a memorandum account for future recovery.
- The SCE PD should be modified to clarify that using outcome-based measurements as “metrics” to gauge program effectiveness must be analyzed over the long term, and not over the course of a single WMP cycle.

## I.

### **DECISION APPROVING SOUTHERN CALIFORNIA EDISON COMPANY'S 2019 WILDFIRE MITIGATION PLAN PURSUANT TO SENATE BILL 901**

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 Decision Approving SCE's 2019 Wildfire Mitigation Plan (WMP) Pursuant to Senate Bill (SB) 901 (SCE 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 individual WMPs and provides Comments on the SCE PD. In addition, pursuant to Rule 14.3(b) and (c), in Appendix A attached hereto SCE proposes specific language changes to the SCE PD's proposed Findings of Fact, Conclusions of Law, and Ordering Paragraphs. SCE appreciates the well-reasoned SCE PD and supports the majority of the proposals and guidance set forth therein. SCE's Comments below address the limited issues that SCE believes should be corrected or changed in the Final Decision.

#### **A. Non-CPUC HFRA**

The SCE PD incorrectly critiques SCE's efforts to identify and evaluate non-CPUC high fire risk areas (HFRA) and proposes recommendations and processes that conflict with its own General Orders (GO), reports by state-commissioned experts, and the statutory directive of Senate Bill (SB) 901. SCE addresses these factual and legal errors below.

- 1. SCE has completed its non-CPUC HFRA evaluation and areas identified to be retained as HFRA once approved by the Commission should be treated equivalently to the Commission's HFTD Tier 2 designation consistent with General Order 95**

The requirement to file an annual WMP and the contents therein are governed by SB 901. SB 901 modified Section 8386(c)(14) to require electrical corporations to "identif[y] geographic areas in three electrical corporation's service territory that is a higher wildfire threat than is currently identified

in a commission fire threat map, and where the commission should consider expanding the high fire threat district based on new information of changes in the environment.” That is precisely what SCE’s non-CPUC HFRA constitutes. SCE was the only IOU that introduced non-CPUC HFRA, explained its HFRA that were outside of the Commission’s High Fire Threat District (HFTD) maps, and explained how internal and external experts were further evaluating these areas to be either “retained” or “removed” from their preliminary designation. As the SCE PD acknowledges, no party directly challenged SCE’s non-CPUC HFRA or recommended a process to further evaluate them.<sup>1</sup> The SCE PD errs by stating that, “It is not clear from SCE’s WMP whether it continues to maintain an HFRA because it disagrees with the HFTD, or simply has not brought its own mapping into compliance with the HFTD requirements.”<sup>2</sup> This is factually incorrect. SCE described its reasons for including such areas and detailed its ongoing evaluation by providing in its WMP two distinct examples: one illustrative area that would be retained and one illustrative area that would be removed, and the reasons supporting those results. For the area retained, SCE explained how the overhead circuitry for a certain polygon area traverses in and out of the CPUC HFTD, had a previous fire in its vicinity, how there are homes that border Tier 2, that the homes are in a hilly area with high vegetation density and have prominent, prevailing winds, and even provided a map that showed the relevant geographic information. SCE went on to describe how these attributes create a higher probability for a fire to propagate into the adjacent hills and why it was recommended to be retained as non-CPUC HFRA. As acknowledged by the SCE PD, no party questioned, challenged, or controverted these facts. The evidentiary facts support the inclusion of areas beyond the CPUC’s HFTD as HFRA based on a rigorous and thoughtful technical review of these areas.

While SCE agrees that it should focus its wildfire mitigation programs in the highest fire risk areas, namely Tier 3, the Commission should recognize, encourage and support utilities in implementing these mitigations in areas that may be outside of the Commission's HFTD but still pose a

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<sup>1</sup> SCE PD at p. 4.

<sup>2</sup> SCE PD at p. 6.

high fire risk. Indeed, GO 95 requires utilities to design, construct and maintain infrastructure to higher standards if known local conditions require such higher standards to enable the utility to deliver safe and adequate service.<sup>3</sup> The Guidance PD even goes so far as to state that PG&E's and SCE's enhanced inspections are "not necessarily beyond GO 95 requirements to conduct inspections more frequently or thoroughly than specified in GO 165, as those are *minimum* requirements."<sup>4</sup>

SCE's completed evaluation has determined that over approximately 95 percent of the square mileage associated with SCE's non-CPUC HFRA should be removed or reclassified as non-HFRA.<sup>5</sup> The areas that are to be retained contain approximately 550 circuit miles of distribution overhead lines and approximately 110 circuit miles of transmission overhead lines. From an operational standpoint, SCE intends to treat these areas and circuit miles in the same manner as it does Tier 2 HFTD areas. In order to effectuate this change, SCE understands the need for the Commission, parties and experts to review and approve these areas. As such, in accordance with the SCE PD's suggestion that "SCE should seek an amendment to the HFTD map to include any such areas"<sup>6</sup> and as further described below, SCE recommends the Commission require SCE to file a Tier 2 AL, to process on an expedited basis (four months) and be made effective after Commission approval.<sup>7</sup>

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<sup>3</sup> See GO 95, Rule 31.1, p. III-5. See also D.17-12-024, Section 4.2.3.3.2 that explains how SCE has a *duty* to follow a higher standard if known local conditions require a higher standard than specified in GO 95 to enable furnishing of safe, proper, and adequate service.

<sup>4</sup> Guidance PD, p. 27, FN 38 (emphasis added).

<sup>5</sup> While SCE's evaluation has been completed, there are necessary steps to operationalize the outcome including updating SCE's GIS mapping systems, currently in process, that will produce more precise geographic and circuit mile information.

<sup>6</sup> SCE PD at p. 7.

<sup>7</sup> GO 96-B contains the requirements for Advice Filings, including the specific Energy Industry Rules. Energy Industry Rule 5 outlines the Tier Classifications for Advice Filings. While Tier 2 Advice Filings are typically effective after Staff approval, SCE requests that this Advice Filing be effective after Commission approval in accordance with General Rules 7.6.1 and 7.6.2 of GO 96-B. The action requested requires more than ministerial action, and thus disposition on the merits should be by Commission Resolution on an expedited basis.

**2. The Commission should endorse a transparent and efficient process to include areas outside its designated HFTD as HFRA**

The SCE PD grapples with how the utilities should propose (and the Commission should process) additions (or subtractions) to the Commission’s HFTD. As detailed in SCE’s Comments on the Guidance SCE PD, the Commission should establish more efficient processes to review, assess, and where applicable, authorize, utilities to act on the most current and best information. SCE agrees that there needs to be a review and approval process. However, any petition to “amend” (or more correctly petition to modify) a Commission decision would take months if not years to conclude. Instead, for this year’s HFRA changes, the Commission should direct SCE to file a Tier 2 AL within 30 days of this decision and process it within four months. For administrative efficiency purposes, this Tier 2 AL filing could also include the SCE PD’s requirement that SCE further describe its Enhanced Overhead Inspection (EOI) program “to clarify what the inspections involve, including a description of the specific activities that will be performed as part of these inspections, data that will be collected, and any databases that will be created or supplemented as part of these inspections.”<sup>8</sup>

In subsequent years, the Commission should order utilities to include proposed changes to HFRA in the annual WMP filings. During subsequent years’ WMP submittal process, parties, experts, and other stakeholders would have the opportunity to review and comment on proposed Tier 2 or Tier 3 treatment of non-CPUC HFRA. The Commission should require such an annual WMP HFRA “update” instead of calling for less efficient procedural processes such as potentially multiple petitions to modify D.17-12-024, which could cause confusion and additional work for all parties beyond the annual WMP filing process. The legislature expects utilities to assess areas outside the HFTD on a going forward basis given dynamic climate change, and the Commission should establish a process to review and approve additions and subtractions to HFTD through the WMP process.

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<sup>8</sup> SCE PD at p. 12.



## **B. Inspection and Maintenance**

While some parties raise questions about SCE's EOI program, the SCE PD authorizes SCE to continue it. The SCE PD also states that "SCE's Enhanced Inspection Program should not consist simply of perfunctory "drive-by" patrols" and questions "how SCE can perform detailed inspections of this volume of equipment in so short a time."<sup>9</sup> SCE provides further clarification here: Section 4.2.3 of SCE's 2019 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. The EOI are not "drive-by" patrols, but rather thorough inspections being performed by qualified electrical workers,<sup>10</sup> the same employees that build and maintain electrical systems. In order to complete these inspections in a timely manner, before the start of the height of the 2019 wildfire season, SCE reallocated hundreds of SCE employees from across its service territory to complete these inspections.<sup>11</sup> 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. If required by the final SCE decision, SCE will file a Tier 1 Advice Letter further describing its EOI program, and the required related information on the program.<sup>12</sup> Finally, the relevant Conclusion of Law and Ordering Paragraph should be modified to make clear that the required "focus" on Tiers 2 and 3 for vegetation management activities is referring only to *enhanced* vegetation management programs, not traditional prescribed inspection programs.

Additionally, the SCE PD states that "many of the enhanced inspection and maintenance programs (*e.g.*, LiDAR) focus on its transmission system."<sup>13</sup> SCE respectfully disagrees; SCE is conducting a comprehensive effort to mitigate wildfires across both distribution and transmission

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<sup>9</sup> SCE PD at p. 11.

<sup>10</sup> 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.

<sup>11</sup> Appendix E of the 2019 WMP contains a listing of "SCE Field Workers, Support Personnel and Contract Crews."

<sup>12</sup> See page 12 of the SCE PD.

<sup>13</sup> SCE PD at pp. 12-13.

infrastructure. However, as described in Section 4.3.3 the focus of system hardening activities is to reduce wildfire risk associated with distribution infrastructure.

**C. System Hardening**

SCE agrees with the SCE PD that it “should focus [deployment of covered conductor] on the areas that present the greatest risk of wildfire and the greatest consequences... .”<sup>14</sup> SCE made clear in its GSRP (A.18-09-002) circuit prioritization methodology that it conducted a risk-informed process to determine how best to prioritize covered conductor work, incorporating ignition probability assessment as well as consideration of relative consequence risk. SCE initially considered an approach of deploying covered conductor on portions of all circuits traversing CPUC Tier 3 HFRA. However, SCE refined its approach to consider ignition consequence, probability of ignition, and effectiveness of mitigation, across several factors.<sup>15</sup> While more weight was assigned to overhead facilities within Tier 3, the risk-informed methodology, which accounted for circuit-specific risk factors beyond location within Tier 3, ranked certain Tier 2 circuits higher on the priority list than certain Tier 3 circuits. Virtually all covered conductor that SCE has already planned and proposed for 2019 is included within Tier 3 and Tier 2 fire threat areas and represent locations where deployment of system hardening measures would yield significant risk reduction.

SCE agrees with TURN’s position in the GSRP proceeding that the prioritization process should continue to be enhanced to target overhead conductor replacement at a more granular level. While the completion of this initial analysis at the circuit level was the best approach based on the information available to SCE at that time, SCE continues to enhance the prioritization methodologies that are in use. In 2019, SCE engaged an expert engineering firm to develop a fire propagation model for areas surrounding SCE’s overhead facilities within the HFRA, and to identify relative consequence should an ignition occur at a specific location based on fire weather climatology, terrain, vegetation, and Census data. After analyzing the fire spread and consequence results, SCE began enhancing its prioritization

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<sup>14</sup> SCE PD at p. 17.

<sup>15</sup> See March 22, 2019 SCE Reply Comments at Appendix C.

methodology by factoring the more granular ignition-consequence information while also making improvements to models used to predict overhead assets that were susceptible to wire-to-wire contact and equipment failure. SCE's enhanced wildfire risk assessment includes an analysis on types of outages which may have led to an ignition where bare conductor was used. In addition, SCE is currently developing a wildfire risk model at a circuit and segment level, which will further assess risk exposure, and inform the prioritization efforts for various mitigations based on ignition probability and fire consequence. The model currently under development will incorporate several external data sources such as weather data, vegetation and fuel density data, and population and structure density, in addition to SCE overhead circuit and asset data. As SCE improves its prioritization method, it will continue to rank circuits and segments by risk and will reprioritize the deployment of covered conductor to incorporate circuits and segments identified by the updated method and the circuits already planned through previous modeling. These issues will be further explored in SCE's ongoing GSRP proceeding.<sup>16</sup>

Given SCE's ongoing efforts to continuously improve its risk and prioritization analyses, and the fact that SCE will be using more granular information at a segment level, it is possible that certain segments in retained non-CPUC HFRA could be determined to be higher risk areas than segments in Tier 2 or Tier 3 areas. If SCE's more precise modeling results in any non-CPUC HFRA circuit segment that is a higher risk and SCE plans to cover those sections this year, SCE will file a Tier 1 AL consistent with the direction in the SCE PD. At this time, there is a *de minimis* amount of planned covered conductor work in non-CPUC HFRA circuits currently scoped for deployment in 2019. As such, SCE requests the Commission modify the SCE PD to allow SCE to file a Tier 1 AL at any point in 2019 if improved modeling determines any non-CPUC HFRA circuit segment that is a higher risk and can be deployed in 2019.

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<sup>16</sup> See, e.g., April 23, 2019 TURN Testimony (Borden) in A.18-09-002. SCE's rebuttal testimony is due on May 31, 2019.

**D. Vegetation Management**

The Commission “share[s] some of the concerns that the parties raise about the potential overlap between vegetation management and system hardening (especially the covered conductor program).”<sup>17</sup> But the presence of covered conductor does not eliminate the need for enhanced vegetation management, nor does the application of enhanced vegetation management eliminate the need to install covered conductor. SCE is deploying covered conductor to reduce the number of Contact from Object (CFO) faults, therefore reducing ignition risk. Enhanced vegetation management, on the other hand, is being deployed in conjunction with covered conductor to more rigorously reduce the volume of potential vegetation contacts. For example, covered conductor deployment alone would not prevent tree limbs from falling onto overhead lines as a result of high winds. Conversely, deploying only enhanced vegetation management would not reduce CFO faults due to animal contact, balloons, wind-blown debris, etc. As such, enhanced vegetation management aims to reduce the likelihood of ignition from vegetation contact with and falling into overhead lines by increasing clearances. In addition, SCE’s covered conductor program is still relatively new and will take several years before it is fully deployed.

The SCE PD states that “for its next WMP, SCE should determine how many hazard trees and ‘reliability trees’ exist in its territory, give the trees risk ranks, and show a causal connection between the reduction in number of hazard trees and the reduction in system faults, ignitions and wires down events. SCE should also describe ‘hazard trees’ more clearly in its next WMP, in a manner that explains the conditions that pose expected risk, and compare its own definition to descriptions in CAL FIRE’s Powerline Fire Prevention Field Guide, available on the CAL FIRE website.”<sup>18</sup> This proposed requirement is unreasonable and potentially impossible. A determination of the number of hazard trees and “reliability trees” in SCE’s service territory and risk rank is not supported by the record in this proceeding and prejudices an issue currently being litigated in SCE’s GSRP proceeding.<sup>19</sup> SCE

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<sup>17</sup> SCE PD at p. 21.

<sup>18</sup> SCE PD at p. 23.

<sup>19</sup> Guidance PD, p. 23. Ordering Paragraph 9, on page 50, is somewhat inconsistent with the discussion on page 23 in that it states “In future Wildfire Mitigation Plans...” instead of “In the next WMP...”.

estimates there are potentially 2 – 4 million trees within the utility strike zone in HFRA. In its WMP, SCE estimated that in 2019 it would perform at least 125,000 tree-specific threat assessments and remove approximately 7,500 trees. SCE also stated that it would take approximately 5 to 8 years to complete the first pass of assessments and mitigations in HFRA.<sup>20</sup> No parties recommended that these assessments should or could be completed by the next WMP submittal, which is in just over 8 months.<sup>21</sup>

SCE implemented its Hazard Tree Management Program (HTMP) in February 2019 and to date has completed assessments of approximately 25,500 trees in HFRA. SCE's current efforts are yielding a daily assessment rate of approximately 32 trees per assessor. Based on this assessment rate, SCE would need to hire and train between 350 and 650 assessors to identify and assess the estimated 2 – 4 million trees in the utility strike zone in HFRA by February 2020.<sup>22</sup> This would require significantly more trimming and removal crews to complete remediation within the allotted period of time provided by SCE's HTMP. SCE does not believe there are enough qualified resources available to meet this overly aggressive pace of assessments and mitigation. Even if resources were available, SCE estimates that forecasted 2019 and 2020 costs for this activity would increase by at least 10 times from approximately \$92 million,<sup>23</sup> to \$920 million.

The incremental costs of SCE's HTMP are currently being actively litigated in SCE's GSRP proceeding. SCE's GSRP cost forecast of approximately \$92 million includes the 2019 estimated tree assessments and removals included in its 2019 WMP, as well as its 2020 forecasted activities. TURN opposes that proposal and the Commission will decide the issue in that separate proceeding. Since this issue is currently being litigated in the GSRP proceeding, the SCE PD should be modified so as not to pre-judge the result in that proceeding, especially in a manner that increases the costs of the program by

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<sup>20</sup> SCE WMP, p. 59.

<sup>21</sup> The 8 months assumes that SCE's next WMP is filed in early February 2020.

<sup>22</sup> Assuming the qualified assessors are hired and trained by July 1, 2019 (an unrealistic assumption) and they work six days a week, excluding major holidays, each assessor will be able to identify and assess approximately 6,000 trees by the end of January 2020.

<sup>23</sup> A.18-09-002, Exhibit SCE-01A, Table IV-21, p. 118. Costs for tree removal of \$90.7 million and property owner incentives of \$1.2 million. These forecasted costs assume 125,000 and 250,000 tree assessments in 2019 and 2020, respectively and 15,000 and 30,000 tree removals in 2019 and 2020, respectively.

potentially up to 10-times SCE's proposed level. This discussion should be modified to make it consistent with the overall theme stated elsewhere in the SCE PD: "SCE has also requested approval for several activities included in its WMP, and the estimated costs associated with those activities, in A.18-09-002, its Grid Safety and Resiliency (GSRP) application. That proceeding is ongoing, and nothing in this decision should be construed as prejudging the proceeding's outcome."<sup>24</sup>

SCE believes that showing a causal connection between the reduction in number of hazard trees and the reduction in system faults, ignitions and wires down events will be challenging in the short time frame as wire-down events in any given year can be driven by many factors that are not directly in SCE's control (*e.g.*, extreme weather variations year-to-year) and because SCE's enhanced vegetation management programs are just beginning. Over a longer period of time, SCE expects a clearer trend of reduction of system faults and wire-down events will emerge once specific trees have been removed.

The SCE PD states that "SCE's Enhanced Vegetation Management program should capture data related to trimming and removal that allows for detailed assessment of the effectiveness of the work."<sup>25</sup> SCE's new vegetation management program, including its new HTMP, will be capturing specific data including the precise tree/vegetation location, and the type of activity carried out (*e.g.*, trimming, removal, or monitoring). However, the proposal in the SCE PD that SCE should take photographs of its vegetation management activities is not supported by the record in this proceeding; would be extremely burdensome; and would unnecessarily increase SCE's vegetation management-related costs.<sup>26</sup> SCE does not photograph its vegetation management activities, except in extremely limited situations related to certain customer refusals. Requiring SCE to photograph all its vegetation management activities would require SCE to hire additional staff to take pictures, link photographs to specific trees or bushes, and store the photographs. Given the breadth of SCE's vegetation management activities and the need to take multiple photographs per tree or bush, this would be millions, if not tens of millions of photographs per year. Given that there is no factual basis in the record to require SCE to take millions

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<sup>24</sup> SCE PD at p. 13, FN 8.

<sup>25</sup> SCE PD, p. 24.

<sup>26</sup> SCE PD, p. 24.

of photographs and the fact that SCE is required to detail the data it does collect in a subsequent filing or submittal in order to facilitate a process to get at improved data analytics and performance metrics, the SCE PD errs by making this a requirement.

**E. De-Energization**

The SCE PD appropriately defers de-energization issues to be addressed in the pending De-Energization OIR (R.18-12-005). The SCE PD also clarifies that any new requirements approved in that Rulemaking will automatically apply to the WMP approved in this OIR. The SCE PD should also make clear that incremental costs to implement the requirements in the De-Energization OIR decisions should be authorized to be tracked and recorded in the memorandum account that is authorized by the decisions in this OIR. For example, a PD pending in the De-Energization OIR requires the state’s IOUs to coordinate with CalOES and CalFIRE in a statewide public education and outreach campaign for de-energization, which is to begin immediately. SCE agrees that there is a need for this campaign and has already committed staffing and other resources to support it. SCE anticipates this campaign will help meet the education and outreach objectives, such as helping ensure Access and Functional Needs (AFN) populations outside an IOU’s customer base (*e.g.*, people who are homeless) or those not easily identifiable by the utility (*e.g.*, pregnant women and households with children) will know of, and better prepare for, de-energization events. A coordinated statewide campaign also has the benefit of freeing up local government, agency, and IOU resources to focus on core emergency preparedness work over the coming months. This is important.

The incremental costs associated with the statewide campaign are not authorized in SCE’s 2018 General Rate Case (Application (A.) 16-09-001).<sup>27</sup> Because this is a mandated program, SCE and the other IOUs should be authorized to record and recover their incremental costs (and other incremental costs associated with implementing the other operational requirements reflected in the De-Energization OIR PD) in their respective Senate Bill 901 memorandum accounts.

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<sup>27</sup> On May 16, 2019, the Commission unanimously approved the April 12, 2019 PD (as modified) in A.16-09-001. As of the date of this filing, that final decision has not been formally “issued.”

**F. Situational Awareness and Alternative Technologies**

The SCE PD supports SCE’s proposal to investigate alternative technologies to mitigate potential ignitions from the electric system but asks for more detail in the next WMP, including if implemented, how they will be analyzed for effectiveness. While SCE can provide more detail regarding these programs, including timelines for completing and estimated costs, it is not as simple to explain how these technologies will be analyzed for effectiveness, particularly for technologies whose investigations are early on in the process at the time of drafting the WMP. All reasonable attempts will be made to explain how each technology may be analyzed but it is difficult to quantify ignitions that did not occur.<sup>28</sup> For example, if a current limiting fuse interrupts a fault, there is no reliable way to determine whether an ignition would have occurred in its absence. If the evaluation is successful and a technology demonstrates an ability to mitigate potential ignition events, it is likely that deployment targets will be proposed as compliance goals rather than effectiveness metrics, since there are multiple factors, most of which are beyond SCE’s reasonable control, that influence the severity of any given fire season.

**G. Emergency Preparedness, Outreach and Response**

SCE agrees with the SCE PD’s findings in this area.

**H. Support to Utility Customers During and After a Wildfire**

SCE agrees with the SCE PD’s findings in this area.

**I. Metrics, Monitoring and Reporting**

The SCE PD states that “[m]etrics are not intended to support the Commission’s ability to determine whether the utility is in compliance with the WMP, but rather to inform the Commission on whether the programs proposed in the WMP are effective at minimizing the risk of catastrophic wildfire

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<sup>28</sup> For certain technologies, it may be possible to measure effectiveness by metrics other than ignitions prevented (e.g., number of faults interrupted).



from electrical lines and equipment. To that end, SCE’s ‘indicators’ or ‘metrics’ must identify and track trends associated with utility-caused wildfires.”<sup>29</sup>

As stated in the SCE comments in response to the Guidance PD, SCE supports tracking outcome-based measures to inform analysis of wildfire mitigation effectiveness over time. The outcome-based measures proposed by SCE as “indicators” are not defined in the 2019 SCE WMP to be used to evaluate compliance, but instead as the Commission directs, to support trend analysis that will be used to evaluate the long-term effectiveness of SCE’s mitigation strategies and programs. Evaluating the trends for specific outcome-based indicators on circuits that have completed wildfire mitigations will be used to assess how effective the mitigations are at preventing future ignitions.

Though SCE has historical data since at least 2015 on outcome-based measures that SCE identifies as “indicators” (including reportable ignitions, wire downs, and counts of faults on circuits in HFRA), these measures occur infrequently and can vary significantly from year-to-year based on factors outside SCE’s control. Therefore, trends in such measures can only be observed over longer periods of time and not from observations in 2019 alone. For example, SCE’s electrical system includes over 19,000 circuit miles of transmission and distribution on over 1,300 circuits with overhead conductor in HFRA. Across SCE’s HFRA circuits, on an average year there are approximately 50 ignitions and 3,000 overhead faults.<sup>30</sup> SCE’s WMP programs are designed to be multi-year efforts. Several circuits or segments will likely not experience any faults or ignition related to their lines in any given year, but the risk still exists which needs to be mitigated. SCE’s Wildfire Covered Conductor Program (WCCP) for example, is a long-term program started in 2018 with scope extending through 2025. Trend analysis is expected to require years of observation to inform a view on mitigation effectiveness.

Guidance in the SCE PD points out that metrics are required in the WMP to be used “to evaluate the plan’s performance.”<sup>31</sup> Given the challenge in measuring effectiveness over time of reducing

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<sup>29</sup> SCE PD, p. 43.

<sup>30</sup> Counts are based on annual averages from 2015 to 2017. Ignition counts are based on CPUC Reportable Ignitions and faults are based on SCE Outage Database and Reliability Metrics. Counts are approximate and are consistent with the HFRA mapping submitted in the initial SCE WMP filing.

<sup>31</sup> SCE PD, p. 43; Pub. Util. Code §8386.

infrequent outcomes, SCE fully supports establishing outcome-based “measures” identified in the SCE 2019 WMP to track the long-term effectiveness of wildfire risk mitigation programs (although plan *compliance* should still be evaluated pursuant to activity-based metrics as proposed by SCE and the other utilities). Extending time series data on these measures to include data before and after wildfire mitigations are implemented will support long-term trend analysis. In the near-term, however, drawing conclusions on plan performance linked to outcome-based measures should be limited.

**J. Other**

Ordering paragraph four of the SCE PD requires that SCE, upon request, provide “any data, databases or information related to its Wildfire Mitigation Plan and the reporting, metrics, advice letter, and other follow-up requirements set forth in this decision to staff of this Commission or of the California Department of Forestry and Fire Protection.”<sup>32</sup> Though SCE does not oppose providing data to Commission staff or CAL FIRE, the PD’s language errs insofar that it does not recognize that certain information sought may be subject to the attorney-client privilege and/or attorney work product doctrines, and thus, not subject to public disclosure. Even when conducting investigations, California Public Utilities Code Section 316(b)(5) affirmatively acknowledges that the Commission shall have access to all sought documents “not subject to attorney-client privilege or attorney work product doctrine.”<sup>33</sup> Thus, SCE respectfully requests that the PD be revised to reflect the indisputably correct state of the law—that SCE shall provide all sought data “*not* subject to the attorney-client privilege and/or attorney work product doctrine.”

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<sup>32</sup> SCE PD, p. 4, OP 4.

<sup>33</sup> P.U.C. Section 316(b)(5).

**II.**

**CONCLUSION**

SCE appreciates the opportunity to submit these Opening Comments on the SCE 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 for SCE PD

### Conclusions of Law

3. SCE should conduct reporting, data gathering and other follow-up on actions in its WMP, as outlined in this decision, to ensure those actions contribute to lowering the risk of catastrophic wildfire. Some of the outcome-based measurement and data reporting should facilitate measurement of risk reduction over long-term time horizons.
4. Southern California Edison should comply with the reporting, metrics, advice letter, and other follow-up requirements set forth in this decision, as follows:
  - a. Within 30 days of issuance of this decision, file a Tier 1 Advice Letter listing with specificity any wildfire mitigation work the company plans during the effective dates of the 2019 Wildfire Mitigation Plan in the SCE's own "High Fire Risk Areas" but not in the High Fire-Threat District the Commission approved in Decision 17-12-024. At any point in 2019, if SCE's refined modeling re-prioritization efforts determine that covered conductor work in non-CPUC-designated HRFA will reduce risk more effectively than covered conductor work in Tier 3 or Tier 2 areas, SCE shall file a Tier 1 Advice Letter informing the Commission of that planned re-prioritization work.
  - b. Within 30 days of issuance of this decision, file a Tier 1 Advice Letter further describing its Enhanced Overhead Inspection program to clarify what the inspections involve, including a description of the specific activities that will be performed as part of these inspections, data that will be collected, and any databases that will be created or supplemented as part of these inspections.
5. SCE should, upon request, provide any data, databases or information related to its WMP and the reporting, metrics, advice letter, and other follow-up requirements, other than such information protected by the attorney-client privilege and/or attorney work product doctrines, set forth in this decision to staff of this Commission pursuant to the Commission's existing confidentiality rules and protections (where applicable). Further, Southern California Edison shall, upon request, provide any such non-privileged, non-confidential data, databases or information to ~~or of~~ CAL FIRE.
6. The metrics portion of SCE's future WMPs should be focused on outcomes, measuring the long-term effectiveness by which the mitigation implemented reduces the risk of its electrical lines and equipment causing a catastrophic wildfire, and with the recognition that many outcome-based results are largely outside of the reasonable control of the utilities.
7. Within 30 days of the issuance of a final decision, SCE shall file a Tier 2 Advice Letter with proposed changes to ~~In its next WMP, SCE should propose a process for bringing its "High Fire Risk Areas" into conformity with the Commission's High Fire-Threat District area maps, or discuss in more detail why it should not be required to do so.~~ This Tier 2 Advice Letter should also include information further describing SCE's Enhanced Overhead Inspection program to clarify what the inspections involve, including a description of the specific activities that will be performed as part of these inspections, data that will be collected, and any databases that will be created or supplemented as part of these inspections. For future WMP cycles, SCE shall include in its initial WMP filings any relevant subsequent proposed changes to its High-Fire Risk Areas.

8. ~~SCE should address in future WMPs how enhanced inspection and maintenance activities, including LiDAR, will target its distribution infrastructure, and not only its transmission system.~~

9. SCE's enhanced vegetation management (*i.e., those that extend beyond those already prescribed by existing compliance requirements*) and grid hardening efforts during this 2019 WMP cycle should focus on the Commission-adopted High Fire-Threat District areas, and also those non-HFTD HFRA areas that SCE proposed to retain as HFRA pursuant to the process described in Conclusion of Law 7 above.

10. ~~In future WMPs, SCE should determine how many hazard trees and "reliability trees" exist in its territory, give the trees risk ranks, and show a causal connection between the reduction in number of hazard trees and the reduction in system faults, ignitions and wires down events. SCE should describe "hazard trees" more clearly in its future WMPs, in a manner that explains the conditions that pose expected risk, and compares its own definitions to descriptions in the CAL FIRE's Powerline Fire Prevention Field Guide.~~

12. SCE should provide detail about the alternative technologies it is using or considering for wildfire mitigation and prevention in its future WMPs in the ~~"meet and confer"~~ report ordered in the accompanying guidance decision.

#### Ordering Paragraphs

2. Southern California Edison shall comply with the reporting, metrics, advice letter, and other follow-up requirements set forth in this decision, as follows:

a. Within 30 days of issuance of this decision, file a Tier 1 Advice Letter listing with specificity any wildfire mitigation work the company plans during the effective dates of the 2019 Wildfire Mitigation Plan in the SCE's own "High Fire Risk Areas" but not in the High Fire-Threat District the Commission approved in Decision 17-12-024. At any point in 2019, if SCE's refined modeling re-prioritization efforts determine that covered conductor work in non-CPUC-designated HRFA will reduce risk more effectively than covered conductor work in Tier 3 or Tier 2 areas, SCE shall file a Tier 1 Advice Letter informing the Commission of that planned re-prioritization work.

b. Within 30 days of issuance of this decision, file a Tier 1 Advice Letter further describing its Enhanced Overhead Inspection program to clarify what the inspections involve, including a description of the specific activities that will be performed as part of these inspections, data that will be collected, and any databases that will be created or supplemented as part of these inspections.

4. Southern California Edison shall, upon request, provide any data, databases or information related to its Wildfire Mitigation Plan and the reporting, metrics, advice letter, and other follow-up requirements, other than such information protected by the attorney-client privilege and/or attorney work product doctrines, set forth in this decision to staff of this Commission pursuant to the Commission's existing confidentiality rules and protections (where applicable). Further, Southern California Edison shall, upon request, provide any such non-privileged, non-confidential data, databases or information to ~~or of~~ the California Department of Forestry and Fire Protection.

5. Southern California Edison's metrics portion of its future Wildfire Mitigation Plans shall be focused on outcomes, measuring the long-term effectiveness by which the mitigation implemented reduces the

risk of its electrical lines and equipment causing a catastrophic wildfire, and with the recognition that many outcome-based results are largely outside of the reasonable control of the utilities.

6. Within 30 days of the issuance of a final decision, SCE shall file a Tier 2 Advice Letter with proposed changes to ~~In its next Wildfire Mitigation Plan, Southern California Edison shall propose a process for bringing its “High Fire Risk Areas” into conformity with the Commission’s High Fire-Threat District area maps, or discuss in more detail why it should not be required to do so.~~ This Tier 2 Advice Letter should also include information further describing SCE’s Enhanced Overhead Inspection program to clarify what the inspections involve, including a description of the specific activities that will be performed as part of these inspections, data that will be collected, and any databases that will be created or supplemented as part of these inspections. For future WMP cycles, SCE shall include in its initial WMP filings any relevant subsequent proposed changes to its High-Fire Risk Areas.

7. ~~Southern California Edison shall address in future Wildfire Mitigation Plans how enhanced inspection and maintenance activities, including Light Detection and Ranging, will target its distribution infrastructure, and not only its transmission system.~~

8. Southern California Edison’s enhanced (i.e., those that extend beyond those already prescribed by existing compliance requirements) vegetation management and grid hardening efforts during this 2019 Wildfire Mitigation Plan cycle shall primarily focus on the Commission’s High Fire-Threat District areas, and also those non-HFTD HFRA areas that SCE proposed to retain as HFRA pursuant to the process described in Ordering Paragraph 6 above.

9. ~~In future Wildfire Mitigation Plans, Southern California Edison (SCE) shall determine how many hazard trees and “reliability trees” exist in its territory, give the trees risk ranks, and show a causal connection between the reduction in number of hazard trees and the reduction in system faults, ignitions and wires down events. SCE shall describe “hazard trees” more clearly in its future Wildfire Mitigation Plans, in a manner that explains the conditions that pose expected risk, and compares its own definitions to descriptions in the California Department of Forestry and Fire Protection’s Powerline Fire Prevention Field Guide.~~

11. Southern California Edison shall provide detail about the alternative technologies it is using or considering for wildfire mitigation and prevention in its future Wildfire Mitigation Plans in the “~~meet and confer~~” report ordered in the accompanying guidance decision.

13. Southern California Edison is authorized to open the memorandum account described in Public Utilities Code Section 8386(e), which provides: “At the time it approves each [Wildfire Mitigation] plan, the commission shall authorize the utility to establish a memorandum account to track costs incurred to implement the plan.” SCE is authorized to record the costs it incurs related to the upcoming statewide public education and outreach campaign from the De-Energization OIR (R.18-12-005) in this memorandum account or in its previously-authorized Fire Risk Mitigation Memorandum Account, as applicable.

**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 **COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE (PROPOSED) DECISIONS ON INDIVIDUAL UTILITIES 2019 WILDFIRE MITIGATION PLANS 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:

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**ALJ Peter V. Allen  
ALJ Sarah R. Thomas  
California Public Utilities Commission  
Division of Administrative Law Judges  
505 Van Ness Avenue  
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Executed on **May 20, 2019**, at Rosemead, California.

**/s/ Edith Leon**

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