

PUBLIC UTILITIES COMMISSION

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SACRAMENTO, CA 95814



May 4, 2021

Shinjini Menon

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Southern California Edison Company
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Subject: The Wildfire Safety Division Issuance of Revision Notice for Southern California Edison Company's 2021 Wildfire Mitigation Plan Update and Notice of Extension of WSD Determination Per Public Utilities Code 8389.3(a)

To Shinjini Menon,

Attached is a Revision Notice issued in conjunction with the Wildfire Safety Division's (WSD) review of Southern California Edison (SCE) 2021 Wildfire Mitigation Plan (WMP) Update. This Revision Notice outlines critical issues that must be addressed by SCE before the WSD can issue a determination on the SCE 2021 WMP Update. For each identified critical issue, the WSD sets forth the remedy that SCE must employ.

By June 3, 2021, SCE must submit via email to the Director of the Division a Revision Notice Response resolving the identified critical issues. The Revision Notice Response must be submitted to WildfireSafetyDivision@cpuc.ca.gov and distributed to the service list of Rulemaking 18-10-007. Parties will have seven days for comments and six days for reply comments, due on June 10, 2021, and June 16, 2021, respectively.¹

The WSD finds the critical issues to be of significant enough importance such that an extension of the three-month statutory deadline is necessary for the WSD to adequately determine that SCE's 2021 WMP Update satisfies the information requirements as set out in WSD-011 and, when implemented, will sufficiently reduce utility-related wildfire risk and impacts to public safety.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Thomas".

Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission

¹ WSD's April 27, 2021 Action Statement Extending Deadline set four days for reply comments. The reply comment deadline has been extended to six days to provide stakeholders sufficient working days to address opening comments.

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

May 4, 2021

**Wildfire Safety Division's Revision Notice for
Southern California Edison Company's 2021 Wildfire Mitigation Plan Update****1. INTRODUCTION**

Pursuant to Public Utilities Code (Pub. Util. Code) Section 8386.3(a), before approval of an electrical corporation's (hereafter utility) Wildfire Mitigation Plan (WMP), the Wildfire Safety Division (WSD) may require modification of the WMP. This Revision Notice provides notice to Southern California Edison Company (SCE) that the WSD requires the utility to remedy the critical issues set forth in Table 1, below, before the WSD can consider issuing an approval of its 2021 WMP Update.

Within 30 days of issuance of this Revision Notice, SCE must submit via email to the Director of the Division a Revision Notice Response resolving the identified critical issues. The Revision Notice Response must be submitted to WildfireSafetyDivision@cpuc.ca.gov with service to the service list of Rulemaking 18-10-007. The WSD sets forth below in Table 1 the information SCE must provide or the remedy that SCE must employ for each identified critical issue.

Remedies require SCE to submit a revised version of its 2021 WMP Update. SCE must provide a single updated WMP and auxiliary Excel file that incorporates all required changes across all critical issues listed below. For the revised version of the 2021 WMP Update, SCE must provide both a redlined and clean version of this document. For the updated auxiliary Excel file, SCE must provide a clean version of the file and a change log that documents all adjustments to the file.

Stakeholders may submit comments on SCE's Revision Notice Response within seven days. Reply comments may be submitted within six days following submission of comments.¹ All comments must be submitted to WildfireSafetyDivision@cpuc.ca.gov with service to the service list of Rulemaking 18-10-007.

Pursuant to Pub. Util. Code 8386.3(a), the WSD must issue a written determination on a utility's WMP or WMP Update within three months of submission, unless the WSD makes a written determination, including reasons supporting the determination, that the three-month deadline cannot be met. This Revision Notice serves as the WSD's notice of an extension of the three-month deadline to issue its determination on SCE's 2021 WMP Update. In order to provide SCE sufficient time to address the critical issues set forth in Table 1 and revise its WMP accordingly,

¹ WSD's April 27, 2021 Action Statement Extending Deadline set four days for reply comments. The reply comment deadline has been extended to six days to provide stakeholders sufficient working days to address opening comments.

the WSD herewith provides SCE 30 days to submit its Revision Notice Response. The 30-day response time will necessarily delay the WSD’s evaluation of SCE’s 2021 WMP Update. In addition, the WSD has granted stakeholders the opportunity to provide comments and reply comments on SCE’s Revision Notice Response, further delaying the WSD’s evaluation. The WSD finds the critical issues to be of significant enough importance such that an extension of the three-month statutory deadline is necessary for the WSD to adequately determine that SCE’s 2021 WMP Update satisfies the information requirements as set out in WSD-011 and, when implemented, will sufficiently reduce wildfire risk and impacts to public safety.

2. SUMMARY OF CRITICAL ISSUES AND REQUIRED REMEDIES

Table 1 provides a high-level summary of the critical issues associated with SCE’s 2021 WMP Update and identifies associated remedies sought by the WSD to address each critical issue. Further information on each of these critical issues is provided in Section 3 of this document.

Table 1: Summary of Critical Issues and Required Remedies

Critical Issue No.	Critical Issue Title	Critical Issue Explanation	Summary of Remedy Sought by WSD
SCE-01	Regression of Reported Risk-Spend Efficiency (RSE) estimates for Mitigation Initiatives Compared With 2020 WMP Submission	SCE provides nine fewer RSE estimates for mitigation initiatives compared to its 2020 WMP submission. Furthermore, SCE only provides one RSE estimate for mitigation initiatives located in non-High Fire Threat District (HFTD) and Zone 1 territory.	<ol style="list-style-type: none"> 1. SCE shall identify the initiatives that had RSE estimates in its 2020 WMP but not in its 2021 WMP Update and provide the missing RSE estimates for those initiatives in its 2021 WMP Update. 2. SCE shall provide the RSE estimates for mitigation initiatives located in non-HFTD and Zone 1 territory where they have corresponding RSE estimates in Tier 2 and Tier 3 HFTD areas. If such RSE estimates cannot be provided, SCE shall respond with a thorough explanation for the reasons associated with this.
SCE-02	Inadequate Alternatives Analysis	SCE lacks detailed alternative analysis for mitigation initiative selection by not calculating the RSE estimates for alternative mitigation initiatives.	<ol style="list-style-type: none"> 1. SCE shall elaborate on its decision-making process to include a thorough overview of the initiative selection procedure. The overview must show the rankings of the decision-making factors (i.e., planning and execution lead times, resource constraints, etc.) and pinpoint where quantifiable risk reductions and RSE estimates are considered in the initiative selection process. The WSD recommends a cascading, dynamic “If-Then” style flowchart to accomplish this prioritization requirement. 2. SCE shall present the updated decision-making process by including one example of

Critical Issue No.	Critical Issue Title	Critical Issue Explanation	Summary of Remedy Sought by WSD
			<p>the initiative selection procedure for each of the following mitigation categories:</p> <ul style="list-style-type: none"> a. Situational awareness and forecasting (7.3.2) b. Grid design and system hardening (7.3.3) c. Asset management and inspections (7.3.4) d. Vegetation management and inspections (7.3.5) e. Grid operations and protocols (7.3.6)
SCE-03	Inadequate justification for extensive utilization of covered conductors	<p>SCE fails to provide adequate justification to support its selection of covered conductors in the mitigation initiative selection process. SCE does not provide RSE estimates for alternative mitigation initiatives, precluding a meaningful comparison between initiatives and resulting in a lack of evidence to support SCE's selection of covered conductors. Additionally, SCE attempts to justify its plan for extensive, expedited covered conductor installation with the unsupported assertion that covered conductor installation is the sole mitigation alternative that will allow SCE to increase wind speed thresholds for Public Safety Power Shutoffs (PSPS). SCE fails justify this assertion and fails to commit to PSPS reductions post-covered conductor installation.</p>	<p>1. Using the RSE estimates provided in SCE-01 and SCE-02 above, SCE shall fully and adequately demonstrate why it has selected covered conductors over alternative initiatives in its decision-making process. In particular, SCE shall demonstrate:</p> <ul style="list-style-type: none"> a. How the location of covered conductor installation is focused on its highest wildfire risk circuit segments; b. How the location of covered conductor installation is focused on circuits that are subject to frequent PSPS events; c. The effectiveness of covered conductors both in-field and long-term in comparison to other alternative initiatives; and d. How covered conductor installation compares to other initiatives in its potential to reduce the number and/or length of PSPS events.

Critical Issue No.	Critical Issue Title	Critical Issue Explanation	Summary of Remedy Sought by WSD
SCE-04	Insufficient detail on SCE's Public Safety Power Shut-Off (PSPS) Corrective Action Plan (CAP) is included within its 2021 WMP Update	SCE published a PSPS CAP on February 12, 2021. This CAP provides more detailed information on SCE's PSPS plans and targets than SCE's 2021 WMP Update filed a week earlier on February 5, 2021. The PSPS chapter (Chapter 8) of SCE's 2021 WMP Update is therefore out of date and does not reflect the latest PSPS commitments from SCE.	<ol style="list-style-type: none"> 1. Identify and describe the relevant measures included within the CAP that relate to the following parts of Chapter 8. <ol style="list-style-type: none"> a. 8.0 Public Safety Power Shutoff, Including Directional Vision (p. 336); 8.1.1 Lessons learned from PSPS since the utility's last WMP submission (p. 338); Support for vulnerable customers (p. 339); Sharing data with public entities (p. 339); 8.1.2 Expectations for how the utility's PSPS program will evolve over the coming 1, 3, and 10 years (p. 340) b. 8.1.4 Quantitative description of how the circuits and numbers of customers SCE expects will be impacted by any necessary PSPS events is expected to evolve over time (p. 343) c. 8.2.1 Strategy to minimize public safety risk during high wildfire risk conditions (p. 347); 8.2.5 Protocols for mitigating the public safety impacts (p. 357) d. 8.4.1 How the utility is identifying vulnerable communities (p. 361) e. 8.5 Plans for ensuring PSPS notifications are both timely and accurate (p. 367) 2. In addressing subparts 1.a. through 1.e., above, include relevant, quantitative, and qualitative specifics of what will be updated via the CAP in terms of measures, deliverables, and milestones (i.e., 2021 goals, benchmark dates, expedited work such as number of circuit segments designated for removal from PSPS scope, anticipated wind threshold decreases). 3. In addressing subparts 1.a. through 1.e., above, indicate how the relevant CAP measures will reduce PSPS scope, scale, and frequency. 4. Attach the PSPS Corrective Action Plan to the 2021 WMP Update as an appendix. Do not point to or reference the appendix in lieu of providing direct, complete answers as indicated in the above subparts.

3. CRITICAL ISSUES AND ASSOCIATED REMEDIES

SCE-01

Regression of reported risk-spend efficiency (RSE) estimates for mitigation initiatives compared with 2020 WMP submission

Critical Issue Description

SCE provides nine fewer RSE estimates for mitigation initiatives compared to its 2020 WMP submission. Furthermore, SCE provided only one RSE estimate for mitigation initiatives located in non-High Fire Threat District (HFTD) and Zone 1 territory.

Background

RSE estimates are an essential part of a utility's mitigation initiative selection process. As set forth in the Safety Model Assessment Proceeding (S-MAP) Settlement Agreement, "For each of the mitigations, the utility will calculate the associated Risk Spend Efficiency (RSE), by dividing the mitigation risk reduction benefit by the mitigation cost estimate."² This requirement enables the quantitative comparison of cost-effectiveness of various mitigation initiatives.

In its 2020 WMP, SCE provided RSE estimates for 27 mitigation initiatives.³ Because SCE only calculated the RSE for a fraction of its initiatives,⁴ the utility was required to address the deficiency of "lack of RSE information" in its first Quarterly Report following the 2020 WMP submission.⁵ Despite the insufficient findings of the Quarterly Report,⁶ SCE projects growth in the RSE related capabilities of the 2021 Maturity Model Survey,⁷ yet provides nine fewer RSE estimates for mitigation initiatives in its 2021 WMP Update. RSE estimates provide a pathway to assess the relative risk reduction benefit provided by mitigation initiatives and inform the initiative selection process.

Additionally, of the 18 mitigation initiatives that have RSE estimates, only one initiative contains a RSE estimate located in a non-HFTD area.⁸ Per the 2021 WMP Guidelines, financial information, including risk-spend efficiency for planned or applied mitigation activity of all territory (non-HFTD, Zone 1, HFTD Tier 2, and HFTD Tier 3), shall be reported in Table 12.⁹ By

² D.18-12-014 p. 23

³ Resolution WSD-004 p. 7

⁴ Resolution WSD-004 p. 27

⁵ Resolution WSD-002 p. 20

⁶ Wildfire Safety Division Evaluation of Southern California Edison Company's First Quarterly Report, p. 9

⁷ For Capability 41a of the 2021 Maturity Survey, SCE reported improvement by selecting "Accurate RSE estimates for all initiatives are used to determine capital allocation within categories only (e.g., to choose the best vegetation management initiative)".

⁸ Cell J15 of workbook titled "SCE 2021 update WMP Tables 1-12_20210317_updated.xlsx", sheet "Table12".

⁹ Section 7.3.1 of the 2021 WMP Guidelines p. 43

calculating RSE estimates for mitigation initiatives in non-HFTD, Zone 1, and HFTD areas, SCE will be able to better assess the risk reduction and inspection prioritization in its entire service territory.

Required Remedies

Critical Issue No.	Critical Issue Title	Required Remedies
SCE-01	Regression of Reported Risk-Spend Efficiency (RSE) estimates for Mitigation Initiatives compared with 2020 WMP submission	<ol style="list-style-type: none"> 1. SCE shall identify the initiatives that had RSE estimates in its 2020 WMP but not in its 2021 WMP Update and provide the missing RSE estimates for those initiatives in its 2021 WMP Update. 2. SCE shall provide the RSE estimates for mitigation initiatives located in non-HFTD and Zone 1 territory where they have corresponding RSE estimates in Tier 2 and Tier 3 HFTD areas. If such RSE estimates cannot be provided, SCE shall respond with a thorough explanation for the reasons associated with this.

SCE-02

Inadequate alternatives analysis

Critical Issue Description

SCE lacks detailed alternative analysis for mitigation initiative selection by not calculating the RSE estimates for alternative mitigation initiatives.

Background

Following the evaluation of SCE’s 2020 WMP, the WSD stated that for those selected initiatives where RSE estimates were provided, RSE values were not provided for alternative initiatives, making the selected initiative’s RSE estimates alone insufficient to justify the initiative selection process.¹⁰ SCE does provide a qualitative explanation to explain the initiative selection process by stating:

The RSE metric does not account for certain operational realities, including planning and execution lead times, resource constraints, work management efficiencies, ability to target specific risk drivers and regulatory compliance requirements.¹¹

However, with the lack of RSE estimates for alternative mitigation initiatives, a qualitative justification of the initiative selection process is insufficient and lacks transparency.

¹⁰ Resolution WSD-004 p. 7

¹¹ SCE 2021 WMP Update p. 10

To bring clarity and rigor to the initiative selection process, SCE must elaborate on their decision-making process by providing a thorough overview of the initiative selection procedure from beginning to implementation. The WSD recommends that SCE design a flowchart to demonstrate the decision-making process by ranking the above-mentioned factors (i.e., planning and execution lead times, resource constraints, etc.) and highlighting where quantifiable risk reductions and RSEs are considered in the initiative selection process. As supported by the WSAB,¹² this visual diagram will also provide insight on how modeling outcomes impact decision-making.

Required Remedies

Critical Issue No.	Critical Issue Title	Required Remedies
SCE-02	Inadequate alternatives analysis	<ol style="list-style-type: none"> 1. SCE shall elaborate on its decision-making process to include a thorough overview of the initiative selection procedure. The overview must show the rankings of the decision-making factors (i.e., planning and execution lead times, resource constraints, etc.) and pinpoint where quantifiable risk reductions and RSE estimates are considered in the initiative selection process. The WSD recommends a cascading, dynamic “If-Then” style flowchart to accomplish this prioritization requirement. 2. SCE shall present the updated decision-making process by including one example of the initiative selection procedure for each of the following mitigation categories: <ol style="list-style-type: none"> a. Situational awareness and forecasting (7.3.2) b. Grid design and system hardening (7.3.3) c. Asset management and inspections (7.3.4) d. Vegetation management and inspections (7.3.5) e. Grid operations and protocols (7.3.6)

SCE-03

Inadequate justification for extensive utilization of covered conductor

Critical Issue Description

SCE fails to provide adequate justification to support its selection of covered conductors in the mitigation initiative selection process. SCE does not provide RSE estimates for alternative

¹² WSAB’s Recommendations on the 2021 Wildfire Mitigation Plan Updates for Large Investor-Owned Utilities, Recommendation 3 of Section 2, p. 5

mitigation initiatives to covered conductors,¹³ precluding a meaningful comparison between initiatives and resulting in a lack of evidence to support SCE’s selection of covered conductors. Additionally, SCE attempts to justify its plan for extensive, expedited covered conductor installation¹⁴ with the unsupported assertion that covered conductor installation is the sole mitigation alternative that will allow SCE to increase wind speed thresholds for Public Safety Power Shutoffs (PSPS). SCE fails justify this assertion and fails to commit to PSPS reductions post-covered conductor installation.

Background

During the 2020 WMP evaluations, the WSD determined that “SCE does not sufficiently justify the relative resource allocation of its WMP initiatives to its covered conductor program with any quantifiable risk reduction information.”¹⁵ SCE’s 2021 WMP Update provides a goal of installing over 4,000 miles of covered conductor by the end of 2022.¹⁶ SCE justifies its extensive covered conductor program by referencing its high RSE estimate. However, SCE only provides 27 RSE estimates (as discussed in Critical Issue SCE-01 above), precluding a meaningful comparison between initiatives. Lacking this necessary comparison between alternatives, SCE does not provide adequate evidence to support its extensive utilization of covered conductors for wildfire risk mitigation.

In the 2021 WMP Update, SCE covers approximately 90% of wildfire risk by addressing 2,110 circuit miles, showing marginal additional wildfire risk reduction for the additional 1,890 miles proposed.¹⁷ SCE’s current covered conductor installation plan also fails to address the riskiest circuit segments identified, with only 581 miles of highest risk circuits in the 1,883 miles of planned covered conductor projects.¹⁸ SCE states that covered conductor was selected based on “expected risk reduction, cost, time to deploy, resource availability, and ease of long-term maintenance and repair” but does not expand upon how each of the criteria influenced SCE’s decision-making.¹⁹ Additionally, despite the high cost of covered conductor installation, SCE’s

¹³ As discussed herein in critical issues SCE-01 and SCE-02.

¹⁴ SCE is installing more than four times more covered conductor than the other two IOUs between 2020-2022. PG&E currently has 918 miles planned, SDG&E has 81.9 miles planned, and SCE has 3,965 planned (based on numbers supplied in Comments of The Utility Reform Network on 2021 Wildfire Mitigation Plan Updates, p. 35). Additionally, 90% of SCE’s grid hardening spend is allocated for covered conductor (based on values presented in Table 12 of SCE’s 2021 WMP Update).

¹⁵ Resolution WSD-004 p. 67

¹⁶ SCE’s 2021 WMP p. 108

¹⁷ SCE’s response to TURN-SCE-007 Q001, provided on March 17, 2021

¹⁸ Highest risk circuits comprised of 71 circuits and 1,269 uncovered miles. Comments of the Public Advocates Office on 2021 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities on SCE and SDG&E, p. 7-8

¹⁹ SCE 2021 WMP Update p. 211

covered conductor program deployment is seemingly scoped based on resource availability and constraints instead of wildfire risk reduction.²⁰

The WSD emphasizes that it does not necessarily disagree with SCE's current covered conductor plan, but instead continues to find that SCE has not provided sufficient justification and proof of effective wildfire risk reduction to support its plan. SCE asserts that covered conductor installation results in a 64% reduction in wildfire risk compared to the existing condition.²¹ This assertion is based on SCE's internal subject matter experts' evaluations of the frequency and types of ignition drivers that covered conductor installation is intended to mitigate.²² However, SCE only started its covered conductor installation program in 2018²³ and has installed over 1,500 circuit miles of covered conductor as of its WMP filing.²⁴ Therefore, SCE has relatively little meaningful, in-field data showing the long-term effectiveness of covered conductor. Additionally, SCE's pilot programs are still in the early stages, with some of these programs showing promising results.²⁵ Some pilot initiatives, if used instead of or in conjuncture with covered conductor, could prove to provide more effective wildfire risk mitigation at a lower cost than covered conductor alone.²⁶ However, SCE's current plan for fast deployment of covered conductor does not allow for adequate assessment of these pilot program initiatives. Lastly, SCE fails to account for how it intends to mitigate the remaining wildfire risk in areas where it has installed covered conductor (i.e., SCE's estimated 36% of wildfire risk that remains), apart from continuing to execute PSPS. Despite SCE's lack of observed data, lack of alternatives analysis, and promising pilot programs for alternative initiatives, SCE plans to move forward with an extensive covered conductor installation program at an expedited speed.

In its 2021 WMP Update, SCE focuses on implementing covered conductor on full circuit segments in order to reduce PSPS risk,²⁷ stating that PSPS thresholds cannot be changed until SCE installs covered conductor on the entire circuit segment.²⁸ However, SCE fails to adequately demonstrate that other mitigation alternatives would not provide enough risk reduction to increase wind speed thresholds for PSPS events. SCE's reliance on covered conductor as the sole mitigation alternative that would allow an increase in wind speed

²⁰ "[D]eployment is sized based on 'maximum amount of covered-conductor miles due to resource constraints that [SCE] could execute'" from the Comments of The Utility Reform Network on 2021 Wildfire Mitigation Plan Updates p. 52

²¹ SCE response to TURN-SCE-006 Q004, provided on March 17, 2021

²² SCE response to WSD-SCE-005 Q002, provided on March 19, 2021

²³ SCE 2021 WMP Update p. 210

²⁴ SCE 2021 WMP Update p. 7

²⁵ SCE 2021 WMP Update Section 7.4.1

²⁶ For example, within Table 12 of SCE's 2021 WMP, SCE calculated an RSE estimate for "Continuous monitoring sensors" of 4,456, which is higher than the RSE estimate for "Covered conductor installation" of 3,514

²⁷ SCE's 2021 WMP Update states at p. 340: "SCE had previously prioritized covered conductor installation primarily based on ignition risk reduction analysis. We are transitioning to using PSPS risk as a criterion when installing covered conductor, thereby targeting select areas of the grid expected to be frequently impacted by PSPS."

²⁸ SCE response to CalAdvocates-SCE-2021WMP-08 Q005, provided on March 3, 2021

thresholds for PSPS allows SCE to further increase the scope of covered conductor work, without adequately assessing if alternative mitigation options could provide similar benefits.

Despite its assertion that covered conductor installation is the sole mitigation alternative that would allow an increase in wind speed thresholds for PSPS, SCE fails to commit to PSPS reductions once covered conductor is installed on a full circuit segment. SCE states that by September 1, 2021 it will “revise circuit de-energization thresholds, which could *potentially* support complete removal of an entire circuit or isolatable circuit segment from the PSPS monitoring scope.”²⁹ Ultimately, SCE utilizes its assertion that covered conductor installation will allow an increase in wind speed thresholds for PSPS to justify its covered conductor installation program, yet does not commit to such reductions.³⁰ Despite the high capital costs associated with its covered conductor program, SCE fails to demonstrate that this program will result in reduction in the number and/or length of PSPS events.

Required Remedies

Critical Issue No.	Critical Issue Title	Required Remedies
SCE-03	Inadequate justification for extensive utilization of covered conductor	<ol style="list-style-type: none"> 1. Using the RSE estimates provided in SCE-01 and SCE-02 above, SCE shall fully and adequately demonstrate why it has selected covered conductor over alternative initiatives in its decision-making process. In particular, SCE shall demonstrate: <ol style="list-style-type: none"> a. How the location of covered conductor installation is focused on its highest wildfire risk circuit segments; b. How the location of covered conductor installation is focused on circuits that are subject to frequent PSPS events; c. The effectiveness of covered conductor both in-field and long-term in comparison to other alternative initiatives; and d. How covered conductor installation compares to other initiatives in its potential to reduce the of number and/or length of PSPS events.

²⁹ SCE 2021 WMP Update p. 358, italicized emphasis added.

³⁰ SCE states that it will be raising wind thresholds for fully hardened circuit segments from 31 mph sustained wind speed and 46 mph gust wind speed, stated in SCE’s 2021 WMP Update on p. 341, to 40 mph sustained winds and 58 mph gusts, provided in SCE’s response to CalAdvocates-SCE-2021WMP-08 Q005, provided on March 3, 2021. However, in SCE’s response to WSD-SCE-004 Q019, provided on March 17, 2021, SCE states that “[there] is no one point in time for completing this work because the process to determine whether circuits or circuit-segments that have been covered are fully hardened is a continuous effort.”

SCE-04

Insufficient detail on SCE's Public Safety Power Shut-Off (PSPS) Corrective Action Plan (CAP) is included within its 2021 WMP Update.

Critical Issue Description

SCE published a PSPS Corrective Action Plan (CAP) on February 12, 2021.³¹ This CAP provides more detailed information on SCE's PSPS plans and targets than SCE's 2021 WMP Update filed a week earlier on February 5, 2021.³² The PSPS chapter (Chapter 8) of SCE's 2021 WMP Update is therefore out of date and does not reflect the latest PSPS commitments from SCE.

Background

In its review of the 2020 WMP, the WSD found SCE deficient in its implementation of PSPS. The issue of "Potential notification fatigue from frequency of PSPS communications" was called out as Deficiency SCE-20 (Class B):

SCE's rapid expansion of PSPS implementation and the associated decision-making to "call" a PSPS, led to constant and persistent PSPS events in the summer of 2019. Given PSPS notification requirements, this led SCE's customers and public safety partners to experience notification fatigue, which could potentially reduce the effectiveness of SCE's notifications. Striking the right balance for timely and accurate notifications is paramount to effective emergency planning and preparedness. SCE's PSPS notifications in 2019 were criticized for being overwhelming, inaccurate, or confusing.³³

SCE responded to this deficiency in its narrative in the supplemental filing on February 26; however, much more information has been forthcoming through reporting outside the 2021 WMP Update. This additional material more broadly addresses other issue areas but is inadequately represented in the 2021 WMP Update itself, as described below.

In January 2021, SCE executives were called upon by the CPUC to publicly address the mistakes and operational gaps identified in the utility's execution of its 2020 PSPS events and to provide lessons learned to ensure they are not repeated. In a letter to SCE, CPUC President Marybel Batjer directed the utility to file by February 12, 2021, a CAP based on the identified concerns. In compliance with President Batjer's letter issued January 19, 2021, in R.18-12-005, SCE submitted its CAP related to the PSPS program. Relevant to SCE's WMP, major areas where SCE underperformed in its execution of PSPS events include: 1) transparency of PSPS decision-making process, 2) execution of the notification process, 3) coordination and communication with state and local governments, and 4) identification and notification of Medical Baseline and

³¹ https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2021/R1812005-SCE%20Corrective%20Action%20Plan.pdf

³² <ftp://ftp.cpuc.ca.gov/WMP/2021/Utility/SCE/SCE%202021%20WMP%20Update.pdf>

³³ Resolution WSD-004 p. 51

Access and Functional Needs customers. These additional measures conveyed in the CAP need to be adequately incorporated into SCE's 2021 WMP Update.³⁴

In multiple locations of SCE's 2021 WMP Update, SCE indicated it "may" include elements addressing the Guidelines through Corrective Action Plan activities. This equivocating language indicates that SCE may include information about actions in the CAP addressing the Guidelines of the 2021 WMP Update. Examples are covered in the remedy table below and include CAP-specific measures expanding notification verification to Medical Baseline (MBL) customers, improving partnerships with Community Based Organizations (CBOs) and other stakeholders, improving operational protocols and notification processes, alternatives and refinements to SCE's Community Resource Center (CRC) approach, customer-facing data portal improvements, PSPS dataset integration, engagement of partnerships with entities such as the Access and Functional Needs (AFN) Advisory Council, an enhanced SCE data-sharing portal, and alternatives and refinements to SCE's circuit exception process. Equivocating language is an issue that has been identified previously in the IOU WMPs that were submitted in both 2019 and 2020.³⁵ Resolution WSD-002 addressed this issue and states "continued use of equivocating language may result in denial of future WMPs."³⁶

³⁴ All SCE PSPS activities must comply with CPUC PSPS requirements, including but not limited to those adopted in Rulemaking (R) 18-12-005. In addition, the Commission is monitoring SCE implementation of the Corrective Action Plan.

³⁵ Resolution WSD-002 p. 26: "A continuing issue from 2019 that persists in 2020 WMPs is the extensive use of non-committal equivocating language. The prevalent use of equivocating language results in sparse commitment from utilities for achieving the intended goal of WMPs – reducing the risk of catastrophic wildfire posed by electrical lines and equipment."

³⁶ Resolution WSD-002 p. 27

Required Remedies

Critical Issue No.	Critical Issue Title	Required Remedies
SCE-04	Insufficient detail on SCE's Public Safety Power Shut-Off (PSPS) Corrective Action Plan (CAP) is included within its 2021 WMP Update	<ol style="list-style-type: none"> 1. Identify and describe the relevant measures included within the CAP that relate to the following parts of Chapter 8. <ol style="list-style-type: none"> a. 8.0 Public Safety Power Shutoff, Including Directional Vision (p. 336); 8.1.1 Lessons learned from PSPS since the utility's last WMP submission (p. 338); Support for vulnerable customers (p. 339); Sharing data with public entities (p. 339); 8.1.2 Expectations for how the utility's PSPS program will evolve over the coming 1, 3, and 10 years (p. 340) b. 8.1.4 Quantitative description of how the circuits and numbers of customers SCE expects will be impacted by any necessary PSPS events is expected to evolve over time (p. 343) c. 8.2.1 Strategy to minimize public safety risk during high wildfire risk conditions (p. 347); 8.2.5 Protocols for mitigating the public safety impacts (p. 357) d. 8.4.1 How the utility is identifying vulnerable communities (p. 361) e. 8.5 Plans for ensuring PSPS notifications are both timely and accurate (p. 367) 2. In addressing subparts 1.a. through 1.e., above, include relevant, quantitative, and qualitative specifics of what will be updated via the CAP in terms of measures, deliverables, and milestones (i.e., 2021 goals, benchmark dates, expedited work such as number of circuit segments designated for removal from PSPS scope, anticipated wind threshold decreases). 3. In addressing subparts 1.a. through 1.e., above, indicate how the relevant CAP measures will reduce PSPS scope, scale, and frequency. 4. Attach the PSPS Corrective Action Plan to the 2021 WMP Update as an appendix. Do not point to or reference the appendix in lieu of providing direct, complete answers as indicated in the above subparts.

4. CONCLUSION

Pursuant to Pub. Util. Code Section 8386.3(a), before approval of an electrical corporation's WMP, the WSD may require modification of the WMP. This Revision Notice provides notice to SCE that the WSD requires the utility to remedy the critical issues set forth in Table 1 before the WSD can consider issuing an approval of its 2021 WMP Update. Remedies require SCE to submit a revised version of its 2021 WMP Update. SCE must provide a single updated WMP and auxiliary Excel file that incorporates all required changes across all critical issues listed above. For the revised version of the 2021 WMP Update, SCE must provide both a redlined and clean version of this document. For the updated auxiliary Excel file, SCE must provide a clean version of the file and a change log that documents all adjustments to the file. SCE must submit via email to the Director of the Division a Revision Notice Response resolving the identified critical issues. The Revision Notice Response must be submitted to WildfireSafetyDivision@cpuc.ca.gov with service to the service list of Rulemaking 18-10-007. In order to provide SCE sufficient time to respond and revise its 2021 WMP Update accordingly, the WSD has provided SCE 30 days to submit its Revision Notice Response. The dates for this Revision Notice are:

Revision Notice issued by the WSD:	May 4, 2021
SCE's Revision Notice Response due:	June 3, 2021
Party Comments due:	June 10, 2021
Reply Comments due:	June 16, 2021



Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission