

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

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

R.18-10-007

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U338-E) COMMENTS ON PHASE 2 OF
THE WILDFIRE MITIGATION PLAN PROCEEDING**

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Dated: **August 21, 2019**

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On June 14, 2019, CPUC President Picker and Administrative Law Judge (“ALJ”) Thomas issued the *Assigned Commissioner and Administrative Law Judge’s Ruling Launching Phase 2 of the Wildfire Mitigation Plan Proceeding* (“WMP Phase 2 Ruling”) directing the electrical corporations to comment on (1) additional language outreach, (2) Independent Evaluator (IE) tasks, and (3) process improvements for Commission review of the next cycle of WMPs by August 21, 2019.

Southern California Edison Company (SCE) supports working collaboratively with the Commission, stakeholders, and the other electrical corporations to continually improve the development and processing of next year’s Wildfire Mitigation Plan (WMP) and proposes a few process improvements for consideration. SCE also makes limited recommendations regarding the IE tasks and review process. At this time, SCE does not believe outreach in additional languages other than what was ordered in Decision (D.) 19-05-038 is necessary.¹ SCE’s recommendations are further discussed below.

¹ D.19-05-038 approved SCE’s 2019 WMP and requires SCE’s community outreach and public awareness before, during, and after a wildfire to be communicated in English, Spanish, Chinese, Tagalog, and Vietnamese (as well as Korean and Russian where those two languages are prevalent in SCE’s service territory).

I.

IN-LANGUAGE OUTREACH

A. Additional In-Language Outreach Is Not Necessary At This Time

In a 2015 demographics report of SCE's service territory ("2009-2013 American Community Survey 5-Year Estimates"), the top five non-English languages sorted by populations who do not speak English "very well" included (in rank order): Spanish (1,893,791), Chinese (227,281), Vietnamese (144,042), Korean (97,179) and Tagalog (72,633). In the same survey, Cambodian ranked 9th (19,749) and Russian ranked 13th (10,233).

Based on this data — largely taken from the most recent Census numbers (2010) — SCE translated a summary of the "Dear Neighbor Letter" regarding Public Safety Power Shutoff (PSPS) and wildfire mitigation into Spanish, Chinese, Vietnamese, Korean and Tagalog and included them on the back of the English language letter. The letters will be mailed to all customers throughout SCE's service territory (and have already been mailed to all customers in the High Fire Risk Areas (HFRA)). The letter includes a link to SCE's updated wildfire mitigation ([SCE.com/wildfire](https://www.sce.com/wildfire)) and PSPS ([SCE.com/PSPS](https://www.sce.com/PSPS)) pages on its customer-facing website, [SCE.com](https://www.sce.com). The PSPS web pages have also been translated into Spanish, Chinese, Vietnamese, Korean and Tagalog. SCE also plans to translate [SCE.com/wildfire](https://www.sce.com/wildfire) pages in these five languages by Fall 2019.

Based on the demographic data and SCE's experience to date, SCE does not believe outreach in additional languages other than what is discussed above is necessary at this time.

B. SCE Supports Additional Partnership Opportunities

SCE, Pacific Gas and Electric Company (PG&E) and San Diego Gas & Electric Company (SDG&E) have partnered on the "Power of Being Prepared" statewide campaign to educate customers on PSPS. The campaign includes advertisements (radio, digital) and the website: [prepareforpowerdown.com/](https://www.prepareforpowerdown.com/). Other opportunities to partner on in-language communications include Community Based Organizations (CBOs). For example, Edison International recently provided a

\$500,000 grant to the non-profit Fire Safe Council. The council will use part of these funds to provide a grant to the City of Monterey Park Fire Department to translate their public education materials into Spanish, Cantonese, Mandarin, Vietnamese, Japanese and Korean. SCE supports and will continue to look for similar opportunities with other CBOs.

C. SCE Will Continue Other In-Language Outreach Efforts

SCE will be launching its own PSPS/emergency preparedness ad campaign, including digital banners and radio. These ads will be available during a large PSPS activity and geo-targeted to affected customers. These advertisements will be translated into Spanish, Chinese, Korean, Vietnamese and Tagalog.

A proactive media outreach campaign targeting news outlets serving SCE customers in HFRA is currently underway. Phase 1 of this outreach-based media campaign will include 61 different communities. Phases 2 and 3 of this campaign will include media outlets serving SCE customers in non-high fire risk areas. This targeted media outreach will provide outlets with information on SCE's wildfire mitigation efforts with a focus on PSPS. In-language news outlets will include Spanish, Chinese, Korean and Vietnamese language media.

SCE also maintains dedicated in-language customer service representatives via phone to answer customer inquiries in the following languages: Spanish: 1-800-441-2233; Chinese: 1-800-843-8343; Vietnamese: 1-800-327-3031; Korean: 1-800-628-3061; and Cambodian: 1-800-843-1309. These numbers are listed on SCE.com and on printed customer materials such as bill inserts. SCE also uses a translation services vendor who offers over 150 other languages including Tagalog that are available when requested by a customer.

In addition to the current efforts outlined above, SCE is enhancing its outbound alerts and notifications for PSPS events with in-language options in Spanish, Chinese, Vietnamese, Korean and Tagalog in a consistent approach in both print and digital channels. Given the extensive in-language outreach efforts and customer demographics in SCE's service territory, SCE believes it is not necessary to add other languages at this time.

II.

INDEPENDENT EVALUATOR TASKS

The scope of work identified in the WMP Phase 2 Ruling requires the IE to establish and perform assessments of WMP activities, including field inspections and data reviews. Given that each utility's service territory is different, and each utility performs construction and maintenance activities differently and maintains records differently, SCE suggests that the IEs have significant utility experience including both electrical and vegetation management. SCE also suggests that the IEs are based outside of California to provide an independent view. Furthermore, SCE suggests that the IE be a firm instead of a specific individual, to reduce individual bias. Additionally, SCE suggests that the IEs and the utilities meet and confer before the start of their field inspections. The meet-and-confer process would be used to develop a common understanding of respective roles and responsibilities of the IEs and the utilities. Additionally, the meet and confer could also be used for IEs to explain their methodology for the assessments; and utilities could explain what data is available in its systems of record, and proposed turnaround times for data. Having a common understanding of mutual expectations and processes will hopefully obviate disagreements after-the-fact and streamline field inspections.

SCE also requests that the CPUC allow utilities access to the draft reports so that the utilities can correct any factual errors before the final report is published. Additionally, SCE requests the CPUC to set up a process to resolve any potential disagreements between the utilities and IE before publishing the final report.

Based on the IE scope of work identified in the WMP Phase 2 Ruling, it is unclear if the IE described therein is the same IE that Assembly Bill (AB) 1054 requires the electrical corporations to engage to review their compliance with their annual WMPs. AB 1054 requires that "three months after the end of an electrical corporation's initial compliance period ... and annually thereafter, each electrical corporation shall file with the division a report addressing its compliance with the plan during the prior calendar year."² AB 1054 goes on to state that "before March 1, 2021, and before each March 1

² The IE requirements in AB 1054 are materially the same as those adopted in Senate Bill (SB) 901.

thereafter, the Wildfire Safety Division, in consultation with the Department of Forestry and Fire Protection, shall make available a list of qualified IEs with experience in assessing the safe operation of electrical infrastructure,” and that “each electrical corporation shall engage an independent evaluator listed... to review and assess the electrical corporation’s compliance with its plan.”³

While field inspections can verify certain aspects of an electrical corporation’s WMP, many aspects of the WMP are not verifiable via field inspections.⁴ If the Commission expects the IE performing field inspections to be the same firm that will be engaged by the electrical corporations to review their annual WMP compliance reports and assess compliance with the plan, the IE scope of work should be expanded accordingly.

AB 1054 requires the IE to submit a report by July 1 of each year, which is only three months after the electrical corporations’ submittal of their annual WMP compliance reports. Given that this is a very short period, the Wildfire Safety Division should develop a detailed scope of work for the review and a standard template/checklist for the IE review and reports. This will facilitate timely reviews by the IEs. It will also assure consistency in the review approach and report development if different IEs are hired by the electrical corporations or if different IEs are hired in different years, making reports easy to compare across utilities and over time.

III.

RECOMMEND PROCESS IMPROVEMENTS

SCE recommends limited process improvements for the 2020 WMP cycle. First, going forward, when considering the utilities’ WMPs, the Commission should explicitly evaluate and approve the reasonableness of the scope and schedule of the proposed wildfire mitigation work and activities.

³ The first Annual WMP Compliance Reports will be submitted by March 31, 2020. If a list of IEs is not available prior to the submittal of these reports, the Commission should provide a process by which the electrical corporations can comply with this requirement of AB 1054.

⁴ In SCE’s 2019 WMP, the following are examples of WMP activities that are not necessarily verifiable via field inspections: RA-1 Expansion of Risk Analysis; EVAL-1 Evaluation of HFRA Boundaries; DEP-2 Emergency Responder Training; DEP-1 Customer Education and Engagement; and AT-3 Alternative Technology Evaluations.

Second, for the next WMP cycle (and going forward), the Commission should reinstate its longstanding ten-day data request response period requirement, consistent with the June 14, 2019 Assigned Commissioner and Administrative Law Judge's Ruling Launching Phase 2 of the Wildfire Mitigation Plan Proceeding ruling (Phase 2 Ruling). SCE appreciates the diligence and sense of urgency with which the assigned Administrative Law Judges (ALJs) and ultimately the Commission considered and approved the utilities' 2019 WMPs. The necessary expediency was the basis of an ALJ ruling that required three-day turnarounds for responses to propounded data requests. That extraordinary requirement, while perhaps necessary for the 2019 WMP cycle, is no longer appropriate going forward, especially in light of AB 1054's requirement that future WMPs cover at least a three-year period.

Third, SCE appreciates the prominent role the ALJs and Commission staff performed in leading the inclusive stakeholder process (including input from many intervenor groups representing diverse interests) which ultimately informed the final Commission decisions. That collaborative process including workshops on particular issues should be continued in future WMP cycles.

IV.

CONCLUSION

SCE appreciates the opportunity to submit these Comments and looks forward to working collaboratively with the Commission and all stakeholders on developing future WMPs.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA EDISON COMPANY'S (U338-E) COMMENTS ON PHASE 2 OF THE WILDFIRE MITIGATION PLAN PROCEEDING** on all parties identified on the attached service list(s) **R.18-10-007**. Service was effected by one or more means indicated below:

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

**ALJ Peter V. Allen
ALJ Sarah R. Thomas
California Public Utilities Commission
Division of Administrative Law Judges
505 Van Ness Avenue
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Executed on **August 21, 2019**, at Rosemead, California.

/s/ Edith Leon

Edith Leon

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California
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LAST CHANGED: AUGUST 20, 2019

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