

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

Order Instituting Rulemaking to Further
Develop a Risk-Based Decision-Making
Framework for Electric and Gas Utilities.

R.20-07-013

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) FINAL COMMENTS ON
WORKSHOP REPORT**

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I.

INTRODUCTION

Pursuant to the Commission’s Order Instituting Rulemaking to Further Develop a Risk Based Decision-Making Framework for Electric and Gas Utilities (OIR), as issued on July 24, 2020, Southern California Edison Company (SCE) respectfully submits its final comments on the General Rate Case Plan Workshop #4 Report - Standardization of Risk Assessment Mitigation Plan (RAMP) Filings (Workshop Report) filed on March 11, 2021.¹ Pursuant to the guidance provided by Commission Staff in the workshop presentation materials and the Workshop Report, parties are permitted to submit final comments on the Workshop Report by March 25, 2021.²

¹ The Commission provided notice that it consolidated Rate Case Plan Workshop 4 – General Rate Cases, Safety Modeling and Reporting (D.20-01-002) and Risk-Based Decision-Making Framework Rulemaking Scope Track 3 Workshop (R.20-07-013). This guidance was issued via an email on January 22, 2021.

² General Rate Case Plan Workshop #4 Report Standardization of RAMP Filings, pp. 17, 68.

II. DISCUSSION

While not presented or discussed at the workshop, in its March 4 Post-Workshop Comments Cal Advocates recommended that an additional RAMP refinement be included in the Workshop Report discussing Topic 5 Refining RAMP and General Rate Case (GRC) Procedural Requirements. Specifically Cal Advocates recommended that “Utility RAMP applications should include and consider the results of utility Climate Change Vulnerability Assessments, the requirements for which are laid out in D.20-08-046”.³ In Cal Advocates’ view, given the acknowledged urgency of utility planning for climate change impacts, and the fact that these impacts are already occurring,⁴ the RAMP process is an ideal venue for considering climate change impacts as they pertain to current top utility safety risks (*e.g.*, wildfire). Therefore, Cal Advocates recommends that RAMPs be required to incorporate the results of climate change vulnerability assessments when assessing top utility safety risks, starting with SCE’s next vulnerability assessment/RAMP in 2022.⁵ Cal Advocates also recommends that discussion of specific rules for incorporation of vulnerability assessment results into RAMP filings take place within an RDF Track 3 Working Group.

As noted in the Workshop Report, parties have not yet had an opportunity to comment on this recommendation and SCE is addressing this recommendation in these comments.⁶ SCE also

³ D.20-08-046, Decision on Energy Utility Climate Change Vulnerability Assessments And Climate Adaptation in Disadvantaged Communities (Phase 1, Topics 4 and 5) (August 27, 2020).

⁴ Bedsworth, Louise, Dan Cayan, Guido Franco, Leah Fisher, Sonya Ziaja. (California Governor’s Office of Planning and Research, Scripps Institution of Oceanography, California Energy Commission, California Public Utilities Commission). 2018 Statewide Summary Report. California’s Fourth Climate Change Assessment. Publication number: SUMCCCA4-2018-013. https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf.

⁵ D.20-08-046, p. 100.

⁶ General Rate Case Plan Workshop #4 Report Standardization of RAMP Filings, p. 12.

addresses one of the discussion topics during Track 3b (Updates to RCP Requirements); the appropriate timing for closure of the utility's RAMP proceeding.⁷

A. SCE Does Not Agree that a Discussion of Specific Rules for Incorporation of Climate Vulnerability Assessment Results In This Proceeding Is Substantively Warranted at This Time

SCE notes that Cal Advocates was significantly engaged in the Climate Change OIR Track 4 and Track 5 decision-making process, and that in-depth discussions and thought collaboration took place in the context of that proceeding, over the course of several years. Moreover, Cal Advocates as well as other interested parties will have the opportunity to engage on this topic during the stakeholder feedback process once SCE's Climate Adaptation Vulnerability Assessment (CAVA) and RAMP are filed. The Commission indicated that parties will have an opportunity to comment on vulnerability assessments through the advice letter process when the vulnerability assessments are filed; the Commission will review the vulnerability assessment before an IOU submits its GRC application.⁸ The Commission also indicated that the relationship between the assessments, RAMP, the GRCs and other IOU applications will evolve over time through an iterative process and that it expects over time the IOUs and other stakeholders will develop more sophisticated mechanisms for fully integrating climate change risks into GRCs and other proceedings requesting infrastructure, operations and services funding.⁹

SCE feels it would be premature and unproductive to impose rules or requirements in this proceeding *before* an IOU has even filed its first CAVA report and integrated that report into its RAMP and GRC. SCE should be given the opportunity to present its CAVA and integration into

⁷ Workshop Report, p. 14.

⁸ D.20-08-046 - p. 84.

⁹ D.20-08-046, pp. 83 – 84.

its RAMP in the manner that SCE feels will provide the most transparent and effective integration for Commission evaluation as well as other interested parties.

As directed by D.20-08-046, SCE *does* intend to use the results of the CAVA to *inform* SCE's RAMP. However, SCE does not believe it is appropriate to shoehorn a blunt incorporation of climate change analysis into all safety risks. First, the timing of the climate change impact may fall outside of the temporal scope of the RAMP (*e.g.*, climate change impacts whose scope spans decades into the future, through 2050 or 2070). Second, while climate change impacts are a critical facing the State and its utilities, they may not be logically applicable to certain safety risks (*e.g.*, cyber security).

B. RAMP Proceedings Should Be Closed Prior to the Filing of the Utility's GRC

Under the RCP Decision, the utility's GRC application is filed one year after its RAMP submission. A process exists that requires the Safety Enforcement Division's report and party opening and reply comments within 200 days of the RAMP filing.¹⁰ SCE does not find it beneficial or administratively productive to keep the RAMP proceeding open after the GRC has been filed. The utility is required to take both the RAMP report and any comments into account in developing its GRC requests for authorization. As discussed in Workshop 4, parties maintain focus on how the utility has addressed their RAMP comments in its GRC.¹¹ Evidentiary weighting and decision-making on those requests should appropriately be made in the GRC consistent with Commission guidance from SCE's 2018 RAMP.¹²

¹⁰ See D.20-02-002 at A-1, Appendix A Table 1 (outlining schedule for RAMP Application May 15, SED Report by September 1, Opening Comments on RAMP submission and SED Report by November 15 and Reply Comments by December).

¹¹ See Workshop Report, p. 13.

¹² D.20-10-004, p. 16.

III.
CONCLUSION

SCE appreciates the opportunity to offer these comments, and to participate in this Rulemaking. We look forward to further thought collaboration and robust debate amongst stakeholders as the Rulemaking continues.

Respectfully submitted,

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