

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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IN ATTENDANCE: PRESIDENT MARYBEL BATJER
 COMMISSIONER MARTHA GUZMAN ACEVES
 COMMISSIONER DARCIE HOUCK
 COMMISSIONER GENEVIEVE SHIROMA

ADMINISTRATIVE LAW JUDGES EHREN D. SEYBERT
and SOPHIA J. PARK, co-presiding

)	ORAL ARGUMENT
)	
Application of Southern California)	
Edison Company (U338E) for Authority)	
to Increase its Authorized Revenues)	
for Electric Service in 2021, among)	
other things, and to Reflect that)	Application
Increase in Rates.)	19-08-013
)	
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Virtual Proceeding
July 26, 2021
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Reported by: Rebekah L. DeRosa, CSR No. 8708
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VIRTUAL HEARING

JULY 26, 2021 - 1:35 P.M.

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ADMINISTRATIVE LAW JUDGE SEYBERT:

We will now be on the record. This is the time and place set for the oral argument in Application 19-08-013 concerning the Proposed Decision on Test Year 2021 General Rate Case for Southern California Edison Company.

Today's oral argument is being held remotely. I am Ehren Seybert, one of the administrative law judges assigned to this proceeding. With me is Administrative Law Judge Sophia Park.

We are joined by Commissioner Shiroma who is the assigned commissioner to this proceeding, President Batjer, Commissioner Guzman Aceves, and Commissioner Houck.

Before we start, I would like to ask if any of the commissioners have opening remarks.

Let's begin with Commissioner Shiroma.

COMMISSIONER SHIROMA: Yes. Thank you. Good afternoon, everyone. I want to start by thanking our administrative law judges, Judge

1 Park and Judge Seybert, our Commission staff,
2 and my team for all of the work that has been
3 done on this Track 1 proceeding.

4 Many thanks to our court reporters,
5 Jason Stacey and Rebecca DeRosa, who are
6 chronicling our proceeding today.

7 In this proceeding we've faced many
8 firsts including the first virtual public
9 participation hearing and evidentiary
10 hearings in response to the COVID-19
11 pandemic. We also addressed the need to
12 separate this proceeding into multiple tracks
13 to address significant wildfire mitigation
14 costs in 2018, 2019, and 2020, while also
15 authorizing forecasts for the future years.

16 (Indecipherable) that we voted out
17 for the Track 2 decision addressing 2018-2019
18 recorded costs, the Wildfire Mitigation Plan
19 and fire hazard prevention ahead of this
20 Track 1 position in January of 2021.

21 We also have integrated the new rate
22 case plan into this proceeding adding a third
23 attritional year to the proceeding midway
24 through as Track 4. This proceeding didn't
25 see a major settlement, which presented a
26 challenge but also a great opportunity to dig
27 in and make important decisions to support
28 grid modernization and wildfire mitigation.

1 I look forward to hearing from all
2 of the parties today in oral arguments.
3 Thank you.

4 Back to you, Judge.

5 ALJ SEYBERT: Thank you, Commissioner.

6 President Batjer, do you have any
7 opening remarks?

8 PRESIDENT BATJER: No, Judge. I am
9 sorry. I do not. Thank you. I would, of
10 course, like to thank you and like to thank
11 Commissioner Shiroma for all the hard work.
12 A GRC is extremely labor intensive and
13 difficult. So I thank you for all of your
14 hard work and Commissioner Shiroma and her
15 staff.

16 Thank you.

17 ALJ SEYBERT: Thank you.

18 Commissioner Guzman Aceves?

19 COMMISSIONER GUZMAN ACEVES: Likewise,
20 no comment.

21 Thank you.

22 ALJ SEYBERT: Thank you.

23 Commissioner Houck?

24 COMMISSIONER HOUCK: Just briefly I
25 wanted to thank Commissioner Shiroma's
26 office. Thank both Judge Park and Judge
27 Seybert for their leadership in this and the
28 parties for their diligent participation.

1 And I look forward to hearing from everyone
2 today on these important issues.

3 ALJ SEYBERT: Thank you.

4 Five parties have requested to speak
5 during today's oral argument. The parties
6 have been advised of their allotted time and
7 a speaking order. A chime will sound when
8 each speaker has one minute left. And again
9 when a speaker's time is up. After all the
10 parties have completed their presentations,
11 the commissioners will then have an
12 opportunity to ask questions.

13 Let's move to the first speaker,
14 which is Kevin Payne from Southern California
15 Edison Company.

16 Mr. Payne, you have 15 minutes.

17 ARGUMENT

18 BY MR. PAYNE:

19 Thank you. Good afternoon,
20 President Batjer and Commissioner Shiroma,
21 Guzman Aceves and Houck.

22 And good afternoon also to Judges
23 Park and Seybert.

24 I'm Kevin Payne, and I'm president
25 and CEO of SCE. And I'm SCE's policy witness
26 for this GRC. I want to thank you all for
27 opportunity to talk with you today.

28 I also want to start by

1 acknowledging the ALJs, Assigned Commissioner
2 Shiroma, and their staffs for the efforts in
3 managing the proceeding so far.

4 The Proposed Decision is generally
5 well reasoned, but it has some major policy
6 implications that I think are fundamentally
7 inconsistent with where the state is headed.
8 I want to focus most of my time with you on
9 our efforts to prevent catastrophic wildfires
10 from being sparked by utility equipment
11 during extreme weather conditions.

12 The PD would authorize less than
13 half of the funding for SCE's most important
14 and effective wildfire mitigation program,
15 installation of covered conductor. And it
16 would cripple our ability to protect the
17 safety of many of our communities in the
18 high-fire-threat district the Commission has
19 established.

20 It would also prevent us from
21 substantially reducing the need for Public
22 Safety Power Shutoffs. This would be a
23 disastrous outcome for California that must
24 be avoided by taking decisive action to
25 support our most important and effective
26 wildfire mitigation program.

27 Before I get into the details, I
28 just want to provide some context. It's

1 clear that we're experiencing historic
2 drought and extreme weather conditions that
3 are driven by a changing climate and that we
4 must quickly adapt to this new normal. 2020
5 was the worst year in California history for
6 wildfires. And with the accelerating impacts
7 of climate change, we have every reason to
8 believe that extreme weather conditions will
9 continue and escalate.

10 SCE operates about 10,000 miles of
11 overhead electric distribution lines in the
12 high-fire-threat district, and our goal is to
13 make our lines resilient so we can keep the
14 power on during these challenging weather
15 conditions and avoid our lines causing
16 ignitions and catastrophic wildfires.

17 I want to make sure the Commission
18 understands why covered conductor is so
19 critically important in our wildfire
20 mitigation effort. In our service area, the
21 highest risk of wildfire is when high winds
22 combine with low humidity and abundant dry
23 fuels. Fires that start during these times,
24 spread quickly, and they're nearly impossible
25 to control even with the best firefighting
26 resources. And they threaten the communities
27 that continue to expand into the
28 high-fire-threat district.

1 With these conditions, high winds
2 cause objects to become airborne: Tree
3 branches, Palm fronds, parts, and many other
4 kinds of debris. These are the times when
5 our --

6 (Phone interruption.)

7 MR. PAYNE: -- conductors are most
8 likely to be contacted by those objects and
9 spark a fire. The high winds can also cause
10 two conductors to contact each other with the
11 same result despite meeting
12 Commission-approved design criteria. And,
13 again, this is precisely the time when most
14 fires are most likely to grow quickly and
15 threaten our communities.

16 This is our toughest challenge we
17 face based on our topography and the design
18 of our overhead system. There are only three
19 tools to significantly mitigate this risk.

20 (Inaudible) insulated conductor, which we
21 believe is the most cost effective way to
22 quickly and effectively and permanently
23 reduce this risk. Undergrounding of lines,
24 which cost about eight times as much and
25 takes many years to implement and Public
26 Safety Power Shutoffs.

27 This PD proposes dramatic cuts to
28 covered conductor based on affordability.

1 Given that undergrounding is far more
2 expensive and much slower to implement, that
3 leaves us with only Public Safety Power
4 Shutoffs for reducing the fire risk of our
5 overhead circuits during extreme weather
6 conditions.

7 The Commission has been very clear
8 that PSPS is only to be used as a measure of
9 last resort and has even decided to impose
10 automatic penalties for the use of PSPS in
11 the future.

12 If the Commission adopts this PD, it
13 will be taking our most effective risk
14 mitigation tool out of our hands for a
15 substantial portion of our system in the
16 high-fire-threat district, and leaving us no
17 way to operate more safely during extreme
18 weather conditions except by turning off the
19 power. This is bad policy, it's
20 unsustainable, and it's unsafe for our
21 communities.

22 The PD acknowledge that SCE has
23 rigorously tested and benchmarked covered
24 conductor as a solution and it works. Other
25 utilities across the globe have used it
26 effectively and our early results have also
27 proven positive. In fact on (indecipherable)
28 insulated wires, there has not been a single

1 CPUC reportable ignition from contact with
2 objects or wire-to-wire contacts.

3 Of our 10,000 miles of distribution
4 lines in the high-fire-threat district, the
5 Commission has determined that almost 6,000
6 of those lines are in Tier 3 high-fire-threat
7 district areas, which in the Commission's
8 words are extremely dangerous.

9 SCE's proposed scope of covered
10 conductor work is approximately 6,250 miles
11 through 2023. The PD would authorize only
12 2,750 miles of covered conductor work and
13 leave almost three quarters of our lines in
14 the high-fire-threat district uninsulated.

15 Consistent with our approved
16 wildfire mitigation plans, we're on track to
17 reach this level around the end of this year.
18 So adopting this PD will mean directing us to
19 substantially stop our most important
20 wildfire mitigation program at the end of the
21 first year of what is now a four-year GRC
22 cycle.

23 To justify this dramatic cut, the PD
24 accepts the intervenor advocacy that this
25 ought to reduce 94 percent of the total risk
26 in SCE's high-fire-threat district and that
27 any more work is not worth the cost. If this
28 number was correct, the conclusion might

1 sound appealing, but it's fundamentally wrong
2 and it's based on an inappropriate use of
3 SCE's risk modeling data. And let me be
4 clear that these conclusions are not
5 supported by data or analysis.

6 SCE provided data from a risk model
7 primarily to demonstrate how we would
8 identify the highest risk circuits and
9 sequence our work to gain fastest overall
10 risk reduction. It's not appropriate to use
11 this relative risk data to decide where to
12 stop installing covered conductor.

13 The risk model available at the time
14 we filed the GRC and the model the Commission
15 also used to define high-fire-threat district
16 only had the capability of modeling fire
17 behavior and its consequences for the first
18 six hours after ignition. So it was only
19 useful as a tool, albeit an imperfect one,
20 for estimating the relative risks among the
21 circuits in the high-fire-threat district.

22 TURN incorrectly construes this
23 model as a measure of total risk and uses it
24 to justify stopping covered conductor
25 installation after just 2,500 miles. They
26 claim that this level will mitigate 94
27 percent of the risk, but they are
28 fundamentally incorrect.

1 We all know that wildfires burn for
2 days and weeks not just six hours and that
3 much of the destruction happens beyond the
4 first six hours. These consequences are not
5 captured by the available risk model, but
6 they are very real to the people in the
7 communities that are impacted by wildfire
8 devastation.

9 This misapplication as risk data has
10 led the PD to an incorrect and dangerous
11 conclusion. And if it's adopted, it would
12 leave the majority of our high-fire-threat
13 districts unprotected, unsafe, and with
14 higher than necessary exposure to Public
15 Safety Power Shutoffs.

16 Finally, the PD states that
17 high-fire-risk areas not addressed by covered
18 conductor will still be subject to a whole
19 host of other wildfire mitigation measures.

20 The PD also goes on to say that
21 while some distribution lines may remain
22 uncovered, they will not be completely
23 unprotected. But there are no other wildfire
24 mitigation measures that address foreign
25 objects that fly into lines during high wind
26 events.

27 Covered Conductor by itself
28 mitigates 68 percent of the wildfire risk.

1 The other measures we're implementing like
2 inspections and vegetation management for
3 example are complimentary, but they don't
4 address the same risks as covered conductor.

5 And I want to emphasize that the sum
6 of uncovered distribution lines the PD refers
7 to would be nearly three quarters of our
8 distribution lines in the high-fire-threat
9 district the Commission has established.

10 This leaves us with PSPS as the only
11 remaining alternative for safely operating
12 our overhead lines in extreme weather
13 conditions. Adopting the PD would mean that
14 PSPS can no longer be seen as a measure of
15 last resort.

16 I want to talk for a minute about
17 affordability, which the PD cites as the key
18 reason for dramatic cuts to the covered
19 conductor program. Affordability is very
20 important, and SCE has worked extremely hard
21 over the last several weeks to grid case
22 cycles to reduce costs and limit rate
23 increases. And as a result, SCE's maintained
24 a bundled system average rate that over the
25 long term has tracked local inflation. And
26 SCE's 2021 rates are the lowest of the three
27 IOUs with PG&E 17 percent higher and SDG&E
28 34 percent higher, a disparity that the

1 Commission recognized in its En Banc white
2 paper issued earlier this year.

3 When we chose covered conductor as
4 our most important risk mitigation measure,
5 we made that decision based on the amount of
6 wildfire risks it mitigates, the speed with
7 which it can be deployed, and importantly the
8 fact that it is an order magnitude less
9 expensive than undergrounding, the only other
10 realistic alternative.

11 Unlike certain other wildfire
12 mitigation activities, covered conductor is a
13 long-term solution with an estimated useful
14 life of more than 40 years.

15 (Indecipherable) the PD rationalizes
16 its proposed cuts based on affordability
17 concerns. It uses a narrow perspective of
18 affordability and it provides no data to
19 support its conclusions. Our analysis shows
20 that granting SCE's entire request of
21 6,250 miles instead of the PD's 2,750 miles
22 would change average customer bills by less
23 than \$2 per month at most. That bill impact
24 will be lower for CARE customers. And we
25 also have other customer protection programs
26 in place to assist our most volatile and
27 disadvantaged customers.

28 But in the situation we find

1 ourselves in today with the threat
2 of wildfires, the most important
3 affordability question that we should be
4 asking is not even addressed by the PD. And
5 that is: How affordable is it for our
6 communities and customers to sustain
7 catastrophic wildfires and the ongoing
8 impacts of Public Safety Power Shutoffs?

9 We simply must do what's necessary
10 to make the overhead electric system safe and
11 resilient in our high-fire-threat district.
12 So what does all this mean?]

13 Since 2018, we've transparently
14 shared our covered conductor program, widely
15 selected it, how much we planned to do, et
16 cetera, in the GSRP, the WMPs and the GRC.
17 Stakeholders in all the proceedings, and now
18 this proposed decision, have acknowledged
19 that this technology works. The costs are
20 relatively low, and the risk spend is --
21 efficiency is high. We've never been
22 instructed to stop this beneficial program;
23 in fact, in 2019 and 2020, we had to install
24 enough miles to ensure WMP compliance. Even
25 this year, we were encouraged to deploy more
26 covered conductor to reduce Public Safety
27 Power Shutoffs. In 2021, while we were
28 waiting for this GRC decision, we continued

1 this critical work, and we will have
2 completed about 2500 miles by the end of this
3 year. If the PD's proposed level of 2750
4 miles of covered conductor is not increased,
5 the Commission will, in effect, be directing
6 SCE to stop work on its most important
7 wildfire mitigation activity by the end of
8 this year, or at the latest, early next year.
9 And that process cannot easily be reversed.
10 Once the program ramps down, approximately
11 175 crews, which represents about 700
12 qualified electrical workers, not to mention
13 over 300 other critical personnel we rely on
14 to do this work, will move to other
15 utilities, or leave the state entirely. By
16 adopting the PD, the Commission would be
17 explicitly accepting the remaining risk for
18 communities in the high fire-threat district.
19 It would leave more than 3000 miles of bare
20 wire in our extreme and el- -- and elevated
21 fire risk areas that could have been
22 mitigated by 2023, if our full request were
23 granted.

24 If the PD is revised, together we'll
25 need to explain to the communities we serve
26 why we can't afford to keep them safe for the
27 price of less than two dollars a month per
28 customer. We'll also need to explain that

1 PPS is no longer the measure of last resort,
2 because the funding was not available to make
3 the grid more resilient.

4 Late last year, when the Commission
5 was faced with another GRC proposed decision
6 that included material cuts to wildfire
7 mitigation activities, the Commission chose
8 to restore the funding.

9 President Batjer, you said a rate
10 increase is largely to mitigate the risk of
11 utility-ignited wildfires. These system
12 hardening efforts are not only necessary, but
13 frankly, not negotiable, and are indeed
14 lifesaving. Commissioner Rechtschaffen said
15 it may be costly, but they're measures we
16 cannot afford to do without. I could not
17 agree more with both of you, and we
18 respectfully request that the Commission
19 authorize us to do everything we reasonably
20 can to protect our customers and communities
21 from wildfires by approving our full request
22 for the covered conductor program.

23 Shifting gears briefly to vegetation
24 management, the PD would authorize most of
25 the work scope we requested, but it doesn't
26 adopt the additional contract labor costs,
27 over a \$100 million per year, in large part
28 as a result -- as a direct result of the

1 legislature passing Senate Bill 247. You may
2 recall that this is -- legislation required
3 us to increase the wages and benefits of our
4 tree trimming contract workers. The PD
5 instead would have us track these incremental
6 costs in a balancing account for later review
7 and cost recovery. Authorizing the scope of
8 work, but not authorizing all the costs
9 necessary to do that work, is inconsistent
10 with forecast-based ratemaking. We have to
11 pay our vegetation management crews when they
12 perform the work, and the legislature decided
13 they should be paid significantly higher
14 wages. And because the PD creates a two-way
15 balancing account, there is no risk to
16 customers of overpaying if the forecast costs
17 are not perfect; but, deferring approval of
18 these costs unnecessarily impacts cash flow
19 by requiring SCE to carry large unfunded
20 balances. We urge the Commission to
21 authorize the statutory increases in contract
22 costs for vegetation management now.

23 I want to end as I started,
24 emphasizing the responsibilities we have to
25 help safeguard people, their property and the
26 environment.

27 (Chime sounds.)

28 MR. PAYNE: On July 18, there were 80

1 large fires across the U.S., mostly in the
2 western states. With wildfires becoming more
3 frequent and severe, especially here in
4 California, I, as the CEO of this utility,
5 the Commission, as our regulator, and we, as
6 a state, must do everything we reasonably can
7 to prevent an ignition that leads to
8 destruction of lives and property. This is
9 our collective responsibility, and we want to
10 work with you as partners to get this
11 critical work done as quickly and affordably
12 as possible, and we'll need the funding to
13 protect our communities in the high
14 fire-threat district this Commission has
15 established, and your final decision should
16 modify the PD to grant our request for
17 covered conductor.

18 Thank you very much, and I look
19 forward to getting your questions.

20 ALJ SEYBERT: Thank you, Mr. Payne.

21 The next speaker is Truman Burns
22 from the Public Advocates Office. Mr. Burns,
23 you have five minutes.

24 MR. BURNS: Thank you, your Honor.

25 ARGUMENT

26 BY MR. BURNS:

27 Good afternoon, Commissioners,
28 advisors and ALJ Park and Seybert. I am

1 Truman Burns, project coordinator for the
2 Public Advocates Office. We generally
3 support the proposed decision, and appreciate
4 the considerable effort that went into its
5 preparation. We have comments regarding one
6 matter in the PD concerning executive
7 benefits cost.

8 The PD contains legal and factual
9 errors in its findings and conclusions
10 regarding executive benefits. The PD fails
11 to apply a 50 percent reduction to executive
12 benefits, consistent with prior Commission
13 precedent. Executive benefits are primarily
14 comprised of supplemental pension costs for
15 executives, which are expenses beyond those
16 already fully funded by ratepayers through --
17 through the traditional pension plan. In
18 every Edison GRC since test year 2009, the
19 Commission has found an equal sharing of
20 these costs between ratepayers and
21 shareholders as reasonable. In this
22 proceeding, the PD properly reduces the
23 executive benefits associated with officers'
24 compensation, pursuant to Senate Bill SB 901
25 and Public Util- -- excuse me, Public
26 Utilities Code Section 706; however, the PD
27 fails to reduce the remaining 13.2 million by
28 50 percent, which would be consistent with

1 prior Commission precedent -- precedent in
2 equity. The PD ultimately concludes that the
3 ratepayers should be responsible for these
4 remaining costs, which amount to about
5 80 percent. The PD fails to apply an equal
6 sharing to the remaining executive benefits
7 based on factual inaccuracies in the PD. At
8 page 420, the PD states that the Commission
9 adopted equal sharing approach in past GRCs
10 because executive benefits are based, in
11 part, on executive bonuses, not all of which
12 are recoverable in rates. Because the PD
13 removes all compensation for all employees
14 whose retirement calculation includes
15 bonuses, the PD concludes, on page 421, that
16 the rationale reducing recovery by 50 percent
17 in past GRCs does not apply in this GRC.
18 These assertions of the PD are effectually
19 incorrect. The Commission's primary
20 rationale in Edison's most recent GRCs has
21 been the longstanding precedent of shared
22 responsibility for these costs. The
23 Commission has also found that supplemental
24 retirement plans primarily benefit utilities'
25 executives and shareholders, and were offered
26 to executives to entice them to work for a
27 prolonged period of time. These reasonings
28 all still stand. At page 417, the PD also

1 makes an inaccurate legal conclusion and
2 presumption regarding the legislative intent
3 with respect to SB 901, implying that SB 901
4 imposed some limitations upon the Commission
5 with regard to executive benefits for
6 non-designated officers. However, the
7 Commission did not -- I'm sorry. However,
8 the legislature did not in any way limit the
9 Commission's discretion with respect to
10 compensation pertaining to employees not
11 designated as officers pursuant to SB 901.
12 The Commission should retain an equal sharing
13 of executive benefits after the adjustments
14 apply, pursuant to SB 901, consistent with
15 prior Commission precedent in equity. The
16 costs of supplemental pensions serves --
17 serve to also benefit shareholders, as
18 previously concluded by the Commission. The
19 13.2 million remaining costs should be shared
20 with ratepayers and the shareholders,
21 resulting in the test year forecast of
22 6.6 million for executive benefits.

23 In conclusion, the Commission should
24 revise the PD as proposed by Cal Advocates.
25 Executive benefits costs are largely
26 discretionary spending. If the Commission
27 wishes to make SCE's rates more affordable,
28 it should revise the PD --

1 (Chime sounds.)

2 MR. BURNS: -- to reduce SCE's
3 executive benefits. Thank you for your
4 attention.

5 ALJ SEYBERT: Thank you, Mr. Burns.

6 The next speaker is Elise Torres
7 from The Utility Reform Network. Ms. Torres,
8 you have 15 minutes.

9 MS. TORRES: Thank you.

10 ARGUMENT

11 BY MS. TORRES:

12 Good afternoon, Commissioners and
13 President Batjer. My name is Elise Torres,
14 and I'm a staff attorney at TURN. I'm
15 pleased to be here making this presentation
16 on behalf of -- of dedicated expert witnesses
17 that worked very hard on this case. We work
18 so hard because all of us at TURN strongly
19 believe that electricity, along with food,
20 shelter and water, are basic necessities and
21 a human right. As a necessity, it is
22 essential that electric service remain
23 affordable for all Californians.

24 First, I want to commend ALJ Park
25 and ALJ Seybert and all of the Commission
26 staff that worked very hard on this
27 proceeding for a well-reasoned proposed
28 decision that reflects the evidentiary

1 record, and balances many comport --
2 competing interests.

3 Second, Commissioners, you need to
4 understand this proposed decision authorizes
5 very significant rate increases for Edison's
6 ratepayers. If approved, the PD would
7 authorize revenue requirement increases of
8 7.4 percent in 2021, an additional
9 4.9 percent in 2022, and another 5.4 percent
10 in 2023, an over 17 percent total increase.
11 Based on a monthly total usage of
12 550-kilowatt hours, which is low for many SCE
13 customers, TURN estimates the impacts
14 associated with the PD of at least \$15 per
15 month and \$180 per year for non-CARE
16 customers, and at least \$10 per month and
17 \$120 per year for CARE customers by 2023.
18 These increases will have a meaningful impact
19 on working Californians, many of whom are
20 already struggling to afford their
21 household's basic needs.

22 The Commission must keep in mind
23 that (unintelligible) personal experience
24 bill impacts in combination with revenue
25 requirements (unintelligible) associated with
26 other non-GRC programs and projects, many of
27 which come with a substantial price tag of
28 their own. As an example, these increases do

1 not include rate increases for
2 wildfire-related expenditures made in 2018
3 through 2020 tracked in five memorandum
4 accounts. 391 million in recovery was
5 recently authorized, and another 500 million
6 is currently under review in Track 3 of this
7 GRC.

8 The Commission should reject
9 (inaudible) claim that the PD would leave the
10 utility without enough funds to perform
11 necessary wildfire-related and other safety
12 work. The price tag of SCE's request was
13 unaffordable and unreasonable, and the PD was
14 right to reduce it, while still providing
15 significant funding for many (inaudible)
16 safety measures that were supported by the
17 evidence.

18 Further, the Commission needs to
19 keep in mind several important factors.
20 First, the PD explains in detail why the
21 amounts it would adopt for specific programs
22 are reasonable amounts in light of the
23 record. With some notable -- notable
24 exceptions, which I'll discuss here and in
25 our comments, TURN thinks that (inaudible)
26 find the PD's figure reasonable.

27 Second, Edison's spending in a
28 number of key areas is subject to ratemaking

1 devices that provide the utility's
2 opportunity to recover in rates the actual
3 amount it spends, even if it spends more than
4 the amounts authorized in this GRC decision,
5 so as long as SCE can demonstrate the
6 reasonableness of its recorded spending
7 level. For those areas, which cover the
8 majority of the utility's wildfire mitigation
9 and vegetation management efforts, this GRC
10 decision does not deny recovery of the amount
11 it ultimately spends; instead, it merely
12 establishes a spending level that should be
13 found reasonable at this time based on the
14 record in this proceeding. If Edison ends up
15 (inaudible) more than the GRC authorized
16 level, it merely needs to establish that the
17 recording spending was reasonable, and it
18 will be positioned to achieve full recovery.

19 Now I'll address some specific
20 aspects of wildfire mitigation spending.
21 Public Utilities Code 451 requires just and
22 reasonable rates, and the Commission has a
23 mandate to ensure safe and reliable service.
24 These mandates create a tension we are all
25 wrestling with in order to achieve the right
26 balance; but ultimately, we need to ensure
27 the utility's wildfire mitigation work
28 reduces the most risk possible at the

1 (inaudible) cost to ratepayers. For the most
2 part, this is the approach taken in the PD.
3 Compared to the base year amounts, the PD
4 would almost across the board provide
5 significant increases (inaudible) areas. The
6 PD also authorizes the full amount SCE
7 forecasted for many wildfire mitigation
8 activities. The proposed decision does make
9 reasonable reductions to Edison's covered
10 conductor forecast; however, the 2,750
11 circuit miles of covered conductor authorized
12 in the PD is a massive deployment, the
13 largest expansion of covered conductor ever
14 in California, and would address a
15 significant amount of (inaudible) at a
16 fraction of the cost of SCE's forecast, which
17 better balances affordability with rate
18 reduction. I'll remind you that this is the
19 amount of covered conductor work the PD
20 determined was reasonable for the limited GRC
21 period. It does not prevent Edison from
22 executing the program after this period.
23 For con -- for context, using the utility's
24 own risk model, TURN's 2,500 mile proposal
25 would address 94 percent of the wildfire risk
26 that can be addressed using covered conductor
27 in SCE's high fire risk areas at a cost that
28 is \$2 billion less than SCE's request. And

1 the PD would give us --]
2 (Phone disruption.)
3 MS. TORRES: -- the PD correctly
4 finds --
5 ALJ SEYBERT: I'm sorry. I apologize
6 for interrupting. You're breaking up a bit
7 on my end. Maybe if you could speak a little
8 closer to the microphone.
9 MS. TORRES: Sorry about that. The PD
10 correctly finds the adopted scope is
11 sufficient to address the highest fire risk
12 segments at a fraction of the cost.
13 Further, regarding Mr. Payne's
14 discussion of Public Safety Power Shutoffs as
15 the only alternative to covered conductor, as
16 acknowledged in the PD, SCE has not committed
17 to any reduction in Public Safety Power
18 Shutoffs as a result of the installation of
19 covered conductor.
20 I'll next speak on wildfire
21 vegetation management activities specifically
22 the Hazard Tree Management Program. This is
23 another area where the PD has made
24 appropriate reductions to Edison's forecast
25 in an attempt to maximize the risk reduction
26 (inaudible) spent. The PD properly reduces
27 SCE's forecast for the removal of green
28 living trees under the Hazard Tree Management

1 Program. SCE already has three other
2 compliance-related vegetation management
3 programs that remove tens of thousands of
4 trees per year.

5 The adopted forecast in the PD
6 appropriately accounts for the significant
7 decrease in the annual volume of targeted
8 tree assessment presented in SCE's 2020
9 through 2022 wildfire mitigation plan as
10 compared to its forecast in this GRC and the
11 fact that SCE failed to address the reasons
12 it lowered its wildfire mitigation plan
13 forecast.

14 The PD also accounts for the fact
15 that SCE did not present data demonstrating
16 the positive impacts of the Hazard Tree
17 Management Program and the observed rate of
18 tree-caused circuit interruptions.

19 As I mentioned earlier, another
20 consideration to keep in mind when evaluating
21 Edison's claims regarding the impact of the
22 PD's reduction on its wildfire mitigation
23 program is that for many of these programs
24 the PD adopts or maintains a two-way
25 balancing account or memorandum account so
26 SCE can still seek recovery for spending
27 above the authorized amount. In fact for the
28 wildfire covered conductor program, the PD

1 adopts a wildfire risk management balancing
2 account, a two-way balancing account, that
3 allows SCE to recover between 100 and
4 110 percent of the authorized amount through
5 its GRC advice letter and creates the
6 opportunity for the utility to recover costs
7 in excess of 110 percent through a future
8 application.

9 TURN submits that any above
10 authorized spending should require an
11 application for rate recovery as a Tier 2
12 Advice Letter is not an appropriate vehicle
13 for Edison to establish the reasonableness of
14 its above authorized spending. TURN will
15 address this in more detail in our comments.

16 For all other wildfire mitigation
17 costs, the proposed decision memorandum
18 account treatment that provides SCE a later
19 opportunity to recovery above authorized
20 spending. To be clear, the PD does not deny
21 rate recovery as above authorized amount but
22 merely requires Edison to demonstrate that
23 above authorized costs were spent reasonably.

24 Regarding these labor costs for
25 vegetation management, the PD correctly
26 determined that the update costs exceeded the
27 limited scope for update testimony and should
28 not be included in the test year forecast.

1 SCE will still have the opportunity
2 to recover any costs above authorized levels
3 through the two-way Vegetation Management
4 Balancing Account approved in the PD. Under
5 this balancing account, an application is
6 only required to seek recovery for amounts
7 spent in excess of 115 percent of the
8 authorized amount. This is inappropriate.
9 The PD should be revised to adopt a one-way
10 balancing account and a companion memorandum
11 account for the purpose of recording any
12 above authorized spending, which can then be
13 evaluated for reasonableness.

14 Now I'd like to discuss the issue of
15 wildfire liability insurance. The PD
16 correctly projected Edison's largely
17 unsubstantiated forecast of \$623 million per
18 year for \$1 billion in annual insurance
19 coverage. The PD instead gives \$460 million
20 a year for the same amount of coverage for
21 the opportunity to recover the full amount it
22 actually spent through the existing Wildfire
23 Expense Memorandum Account or "WEMA."

24 While this reduction is an important
25 improvement, \$460 million is still an
26 extraordinarily high amount for ratepayers to
27 pay for \$1 billion of insurance coverage for
28 a single year.

1 The PD also correctly denies
2 Edison's proposed two-way balancing account
3 for insurance costs. Instead SCE would
4 continue to rely on the WEMA to recover above
5 authorized spending and later seek recovery
6 in a reasonableness review application. This
7 is especially important to the extent SCE
8 relies on alternative insurance devices such
9 as self insurance or a catastrophe bond,
10 which were not presented or reviewed in this
11 GRC.

12 A reasonableness review for spending
13 above the authorized amount as well as any
14 spending on such alternative devices will
15 protect Edison's customers from excessive or
16 unreasonable insurance costs.

17 Now I'll turn to grid modernization
18 specifically Edison's automation proposal.
19 The proposed decision should be corrected to
20 note that TURN addressed the safety and asset
21 degradation impact from deploying more remote
22 controlled switches in reply briefs.

23 More importantly the PD improperly
24 accepts Edison's contention, while SCE did
25 not actually provide evidence sufficient to
26 meet its burden of proof to support its
27 proposed deployment of more remote
28 intelligent switches rather than other cost

1 effective technologies that provide similar
2 reliability benefits.

3 The PD appropriately requires Edison
4 to discuss lower cost alternatives in any
5 future request but inappropriately leaves the
6 identification of alternatives to Edison's
7 discretion.

8 If the CPUC allows SCE to go ahead
9 with the deployment of remote intelligent
10 switches, the PD must be updated to require
11 Edison to hold a technical workshop prior to
12 its next funding request. The workshop
13 should include the Safety and Enforcement
14 Division and outside distribution engineering
15 experts to address the relative costs and
16 safety and benefits of remote controlled
17 switches and remote fault indicators on
18 circuits before deploying thousands of remote
19 intelligent switches at a cost of almost \$1
20 billion. Alternatively, the Commission had
21 scoped it for immediate consideration in the
22 new grid modernization rulemaking.

23 Let me turn briefly to short-term
24 incentives and executive compensation. For
25 short-term incentives, there's a distinction
26 between what the utility pays its employees
27 and executives and what ends up getting
28 funded in rates. The Commission has for

1 years funded less than the full amount as is
2 deemed reasonable for the short-term
3 incentive program because some of the
4 incentives are so focused on things that
5 benefit shareholders and provide very little
6 benefit to ratepayers. This has, to my
7 knowledge, never stopped the utility from
8 paying its employees short-term incentives.

9 The PD correctly rejects ratepayer
10 funding for incentives in their financial
11 performance and lobbying category, which
12 primarily benefits shareholders. This
13 results in a 50/50 cost sharing between
14 ratepayers and shareholders for the total
15 short-term incentive program, which is fair.

16 Regarding executive compensation,
17 the PD correctly determined that SB 901,
18 Ratepayer Funding Exclusion for Officer
19 Compensation, applies to all executives at
20 the level of vice president and above. This
21 is an appropriate interpretation based on the
22 plain language of the statute and is
23 consistent with the definition of officers in
24 Edison's own bi-law. This is an important
25 ratepayer protection, and I urge you not to
26 modify this aspect of the proposed decision.

27 Thank you for your time, and I'm
28 happy to answer any questions you may have.

1 ALJ SEYBERT: Thank you, Ms. Torres.

2 The next speaker is Andrew Graf from
3 the Coalition of California Utility
4 Employees.

5 Mr. Graf, you have five minutes.

6 ARGUMENT

7 BY MR. GRAF:

8 Thank you, your Honor. And good
9 afternoon, Commissioner, ALJ Seybert and ALJ
10 Park. My name is Andrew Graf. Thank you for
11 the opportunity to speak today. I'm here on
12 behalf of the Coalition of California Utility
13 Employees.

14 CUE is a coalition of (inaudible)
15 whose members work at nearly all California
16 electric utilities. The International
17 Brotherhood of Electrical Workers, Local
18 Union 47, is a member of CUE and represents
19 approximately 4,500 SCE employees and 3,500
20 employees of contractors working for SCE.

21 These workers do their best every
22 day to provide safe, reliable, affordable,
23 and environmentally responsible service to
24 SCE customers. Despite having endured
25 tremendous pressure of the last three years
26 because of catastrophic wildfires and
27 massively unpopular blackouts, these workers
28 have remained committed to doing the large

1 amount of work needed for SCE's electric
2 system to be as safe and reliable as its
3 customers expect and deserve.

4 They do incredibly dangerous work
5 every single day to keep the lights on. And
6 so we find ourselves totally baffled by the
7 proposed decision slashing the critical
8 wildfire prevention work. The proposed
9 decision reduces SCE's wildfire system
10 hardening proposal by more than half.

11 The legislature did not miss words
12 when it said that the increased risk of
13 catastrophic wildfire poses an immediate
14 threat to communities and properties
15 throughout the state. The legislature has
16 mandated electric utilities to invest in
17 hardening of the state's electrical
18 infrastructure and vegetation management to
19 reduce the risk of catastrophic wildfires and
20 that the utilities ensure its system will
21 achieve the highest level of safety for the
22 reliability and resiliency.

23 These directives are clear.
24 Wildfire prevention must be a top priority,
25 but the proposed decision does not make it
26 so. Hardening the system must be a top
27 priority, but the proposed decision does not
28 make it so. Keeping the lights on must be a

1 top priority, but the proposed decision does
2 not make it so.

3 Indeed in addition to gutting
4 wildfire prevention work, the proposed
5 decision tips its hat to SCE deferring \$1.424
6 billion of distribution infrastructure
7 replacement work. SCE acknowledged in
8 testimony that this work was essential to
9 safe and reliable service but argued it must
10 defer the work so that it can address
11 wildfire prevention because it doesn't have
12 enough workers to do both.

13 Yet at the same time, SCE opposed
14 CUE's proposal to ensure that SCE grows its
15 workforce sufficiently to get all safety and
16 reliability work done. It is astonishing
17 that the proposed decision allows SCE to get
18 away with perpetuating the cycle of deferred
19 safety and reliability work. SCE can't have
20 it both ways, and the Commission can't allow
21 SCE to have it both ways.

22 The Commission should not allow the
23 cycle of deferral to continue. The
24 Commission should adopt a higher head count
25 target for (indecipherable), which
26 incentivizes SCE to hire and train more
27 workers to do the safety and reliability of
28 work. And, of course, if the Commission

1 adopts the proposed decision's reduction to
2 the wildfire conductor -- covered conductor
3 program, SCE will have more than enough
4 people to do the distribution infrastructure
5 replacement work.

6 Yet, the Commission claims in the
7 proposed decision that it still can't
8 authorize this work because there are no
9 plans for how the money would be spent, but
10 that's nonsense. SCE's ramp analysis, which
11 laid the foundation for the distribution
12 infrastructure replacement work that SCE says
13 is necessary for safety and reliability but
14 proposed to defer shows exactly how the money
15 would be spent.

16 There is simply no reason for the
17 Commission to allow SCE to defer critical
18 safety and reliability work. And quite
19 frankly, SCE, the Commission, and the State
20 of California cannot afford for SCE not to do
21 the work. We can't afford another
22 catastrophic wildfire. We can't afford to
23 keep turning the power off.

24 The electric system must be safer,
25 more reliable, and more resilient. The work
26 that is needed to happen is laid out in the
27 record, and it's your job to tell SCE to get
28 the work done. If that means growing SCE's

1 workforce, then require them to do it.

2 Thank you.

3 ALJ SEYBERT: Thank you, Mr. Graf.

4 The next speaker is Jennifer
5 Weberski from the Small Business Utility
6 Advocates.

7 Ms. Weberski, you have five minutes.

8 ARGUMENT

9 BY MS. WEBERSKI:

10 Thank you, your Honor. I'm Jennifer
11 Weberski. I represent the Small Business
12 Utility Advocates. I thank the Commissioners
13 and the ALJs for the time. SBUA generally
14 supports the proposed decision. Our concern
15 throughout the entire application from Edison
16 was the affordability impact of the proposed
17 increase on small business customers. Given
18 what the small business customers have
19 endured over the past 16 months, any undue
20 increase in rates is an increase that they
21 are ill equipped to afford. At this time,
22 most small businesses are still struggling to
23 recover from the lockdowns imposed by COVID
24 restrictions; necessary lockdowns to help
25 ensure the health and safety of Californians,
26 but with undue consequences on small business
27 owners.]

28 As we are struggling to come back in

1 the midst of still increased mandates and the
2 uncertainty of variant (unintelligible) that
3 are going through our community, they are
4 ill-equipped to afford any undue increase at
5 this time. We believe the proposed decision
6 tries to strive between what is necessary for
7 Edison to provide safe and reliable service
8 to its customers and what the customers
9 themselves can afford during these
10 unprecedented times.

11 SBUA would not support any
12 additional increase at this time, given the
13 circumstances that small businesses are
14 facing. We would support the proposed
15 decision -- balanced approach to the decision
16 at this time. Thank you. That is all we
17 have to say at this time

18 ALJ SEYBERT: Thank you, Ms. Weberski.

19 Let's move to rebuttal arguments by
20 Southern California Edison Company.
21 Mr. Payne, you have ten minutes.

22 MR. PAYNE: Your Honor, could -- would
23 it be okay to take a short break, maybe 10
24 minutes to just collect thoughts on rebuttal
25 and be efficient about it? That's what we've
26 done in past oral arguments. It just would
27 be very helpful for me to collect my thoughts
28 for a few minutes after hearing all of that.

1 ALJ SEYBERT: Commissioner Guzman
2 Aceves, did you have -- I could tell you
3 raised your hand. Did you have something to
4 say?

5 COMMISSIONER GUZMAN ACEVES: Yes.
6 Thank you. I just would request maybe five
7 minutes, just given that I think most of us
8 have another obligation coming up.

9 ALJ SEYBERT: And I also want to --
10 agree with you. I also want to save time for
11 questions at the end. So let's take a
12 five-minute --

13 MR. PAYNE: Okay.

14 ALJ SEYBERT: -- break, which will put
15 us back at 2:26.

16 MR. PAYNE: Thank you very much, your
17 Honor.

18 ALJ SEYBERT: Okay. Let's go off the
19 record.

20 (Recess.)

21 ALJ SEYBERT: Let's go back on the
22 record.

23 Mr. Payne, you may proceed with
24 rebuttal argument. You have ten minutes.

25 REBUTTAL ARGUMENT

26 BY MR. PAYNE:

27 All right. Thank you. And I
28 appreciate this time to -- to discuss some of

1 the points that were made by -- by some of
2 the other intervenors.

3 You know, a lot of these comments
4 were focused on affordability, and I think if
5 there is one thing that I can agree with the
6 intervenors on is that there is nothing
7 affordable about a wildfire crisis. We are
8 in extraordinary times. We're dealing with
9 extraordinary issues. But, as the CEO of
10 this company, I can't wish it away. I can't
11 focus narrowly on the electric bill. My
12 responsibilities are much bigger than that,
13 and so are the Commission's. We have to deal
14 with the reality that is right in front of
15 us, and not be taken in by the
16 narrowly-focused arguments about
17 affordability that consumer advocates make
18 here in this case.

19 As I mentioned in my comments up
20 front, we are extremely focused on trying to
21 control our costs, and we have been for many
22 rate case cycles. We knew that there would
23 be costs -- some higher costs coming down the
24 road for certain things. We did not expect
25 this -- the scale and the magnitude of -- of
26 what is happening now in this wildfire
27 crisis. Yes, we have asked for significant
28 funds to fund our most important and most

1 effective wildfire mitigation program, which
2 is covered conductor, \$2.6 billion, in -- in
3 this case, which would make significant
4 headway in the high fire-threat districts
5 within which we operate, those 10,000 miles
6 of overhead conductors. And I want to remind
7 all of you that just two fires in our service
8 territory, one year apart, the Thomas Fire
9 and the Woolsey Fire, created over \$6 billion
10 in claims.

11 So I ask you again, yes,
12 affordability is important; but, we cannot be
13 taken in by narrowly-focused arguments that
14 only consider the electric bill. We have to
15 consider the entire crisis that's in front of
16 us. That's our responsibility. It's our
17 responsibility together, as partners with the
18 Commission, and we are doing the very best we
19 can to do just that. We understand that this
20 is a big request. We understand that it's
21 necessary. It's critical. The people who
22 live in our high fire-threat districts cannot
23 afford more wildfires. And we have the
24 opportunity to prevent them. We have the
25 opportunity to insulate the bare wires that
26 we operate 10,000 miles of in the high
27 fire-threat districts. We should not shrink
28 from that responsibility in this GRC and ramp

1 down our covered conductor program, only to
2 have to take several years to ramp it back up
3 again in the future, if people become
4 satisfied that there is then enough data to
5 support this.

6 Another point that TURN makes is
7 that there's nothing that prevents SCE from
8 just continuing spending, and they can come
9 back and ask for it later. She makes that
10 point about covered conductor, and she also
11 makes it about the vegetation management
12 costs. I'll tell you, when I, as the CEO of
13 the company, read this PD, that's not what I
14 see in that PD. What I see in the PD is that
15 the Commission has -- and that the -- in the
16 proceeding that the judges have considered
17 the evidence, voluminous evidence, on covered
18 conductor, and voluminous evidence on many
19 other things, and they have decided to fund
20 only about a quarter of the covered conductor
21 program across the entire high fire -- high
22 fire threat-dis- -- district. I see no
23 invitation in there to continue spending
24 beyond what the PD would -- would find
25 reasonable. So this -- this assertion that
26 TURN makes that there's nothing that stops
27 Edison from going ahead and continuing, well,
28 I would tell you that I -- as the CEO of this

1 company, I take Commission decisions very
2 seriously, and when the Commission -- when
3 the Commission tells me what they think is
4 reasonable, I respect that. It carries a lot
5 of weight, and it means something to me. And
6 the idea that we would ignore that, and just
7 continue to go about our business of -- of
8 the entire covered conductor program that --
9 that we believe is necessary and appropriate
10 in -- in our high fire-threat district, I --
11 I think, is -- is -- is just not a good
12 argument, and -- and we should not take that
13 into consideration.

14 I also think, with regard to veg
15 management costs, look, this is forecast
16 ratemaking that we work under here. We have
17 a reasonable forecast. TURN had -- we filed
18 it actually early so that TURN would have a
19 full six weeks to look at that vegetation
20 management forecast in the update proceeding,
21 and they would have the opportunity to ask
22 whatever -- whatever questions they wanted,
23 and also, hold (unintelligible) hearings for
24 them to ask our expert when -- witnesses
25 whatever questions that they had. TURN chose
26 not to evaluate those costs. They chose not
27 to spend time on it, and they made a
28 procedural argument that we should just fund

1 those balances for much longer, and then come
2 back later, and ask for them later; but,
3 it -- it's just inconsistent with
4 forecast-based ratemaking. It's unnecessary.
5 It -- it harms SCE's cash flows, which has
6 many other impacts, and it's just not
7 necessary. The Commission should -- should
8 approve the vegetation management costs that
9 were largely mandated by SB 247 so that we
10 can move forward, and not carry unnecessary
11 and unfunded balances.

12 Judge, am I close to my ten minutes?
13 I'm sorry. I wasn't watching -- keeping --
14 do I have a couple minutes left?

15 ALJ SEYBERT: Robert, how much time do
16 we have left?

17 UNIDENTIFIED SPEAKER: 4:30.

18 ALJ SEYBERT: Okay.

19 MR. PAYNE: Okay. Bear with me for one
20 second. It was a very short time to prepare,
21 based on a lot of things that were -- were
22 said.

23 So again, if -- if I -- if I had to
24 offer a theme here, it is I'll just reiterate
25 that we have to deal with the reality that is
26 right in front of us. We can't look at this
27 myopically or narrowly. And it is just poor
28 practice for us to have to carry large

1 unfunded balances for extraordinary lengths
2 of time so that future proceedings can decide
3 whether those expenses were just and
4 reasonable, when we have the information now.
5 And I don't think that we should be forced to
6 do that because TURN chose not to spend the
7 six weeks that we gave them looking at our
8 vegetation management costs, as an example.
9 And I think that -- I think that there is
10 always an opportunity on a program like
11 covered conductor to keep asking for more and
12 more and more data. We've provided reams of
13 data. We've provided engineering analysis.
14 We've provided benchmarking across the globe.
15 We've provided a tremendous amount of
16 information that justifies what we need to do
17 and the urgent need to get it done quickly.
18 And it just feels like there is always more
19 data people can ask for, and that -- and my
20 experience as a business leader is that when
21 people continue to ask for more and more and
22 more data, often times, they're just not
23 comfortable making the decision, and that's
24 usually when leadership needs to step in and
25 decide, what are we going to do? We have
26 plenty of information. We are never going to
27 get to perfect information that will point to
28 covered conductor being the only solution

1 that will ever exist. But, we have a -- a --
2 a live crisis right in front of us now, and
3 we need to act on it. We need to make bold
4 decisions, and we need to move forward. And
5 I would say to you that this decision will
6 effectively shut down our covered conductor
7 program at the end of this year; and it took
8 us years to ramp up to the levels that we are
9 at today, and it will have a devastating
10 effect. There are no other options that will
11 effectively and cost-effectively reduce the
12 risk like covered conductor will. Bottom
13 line is that when you operate 10,000 miles
14 of -- of overhead conductor in a high fire
15 threat-district where your specific problem
16 is high winds, dry weather and -- and debris
17 flying through the air, the only real
18 solution to it is to insulate those
19 conductors from each other and from the
20 debris that is flying through the air due to
21 extreme weather, and there's only two ways to
22 do that, covered conductor and
23 undergrounding. And as I've said,
24 undergrounding costs eight times as much and
25 takes many years to implement.

26 The other thing I wanted to mention
27 really quickly, and President Batjer, I know
28 that this will be near and dear to your

1 heart, if we stopped our covered conductor
2 program at 2750 miles, as this PD suggests,
3 then if you look at all of the circuit
4 segments that have been impacted today by
5 proposed safety power shutoffs -- and I would
6 suggest to you that we have no reason to
7 think the weather's going to get better.

8 It's probably going to get worse. If you
9 take all the circuit segments that have been
10 impacted up 'til today by at least one Public
11 Safety Power Shutoff event, only 40 percent
12 of them, including the ones that are in our
13 public safety -- that are being accelerated
14 in our Public Safety Power Shutoff action
15 plan, would actually be mitigated. The other
16 60 percent would be in the part that you are
17 not -- that you would not find reasonable.

18 So the impacts to Public Safety Power
19 Shutoffs are very real, and as are the -- the
20 remaining residual -- excuse me, the
21 remaining residual risks that will -- will
22 still be in the high fire-threat districts.

23 I think I'm at the end of my time.
24 Thank -- thank you, Judge, for the nudge.

25 ALJ SEYBERT: Thank you, Mr. Payne.

26 That concludes the speakers for
27 today's oral argument.

28 I see a question from Guzman Aceves.

1 Commission Guzman Aceves, please proceed.

2 COMMISSIONER GUZMAN ACEVES: Thank you,
3 Judge Seybert. A question for Mr. Payne; two
4 questions, actually, that I wanted to get
5 clarification on.

6 In your opening remarks, you were
7 very clear that these covered conductors
8 would eliminate the use of PSPS. In TURN's
9 comments, they say that there's actually no
10 firm commitment that having covered
11 conductors will actually lead to no PSPS for
12 that period. And I am recalling, just
13 generally, the -- the OEIS, formerly Wildfire
14 Safety Division, having some similar concerns
15 around risk mitigation and -- and having some
16 ambiguity there.

17 So if you can just be more specific,
18 are you saying that if those wires are now
19 covered, the covered conductors, you will not
20 shut off those wires?

21 MR. PAYNE: Thank you for this
22 question. I think this is really important
23 to clarify.

24 So what we have said is -- well,
25 first off, the question that gets asked and
26 the question that TURN quotes saying that we
27 have not committed to specific reductions in
28 Public Safety Power Shutoffs, I think, is a

1 bit of a distortion of what our response has
2 been.

3 First off, what we have committed to
4 is specific actions that we know will reduce
5 the incidents and the impact of Public Safety
6 Power Shutoffs. But, as we all know, the
7 amount of Public Safety Power Shutoffs that
8 happen and the duration of those and the
9 number of come -- customers impacted by those
10 are a function of the weather. And so where
11 we've stopped short from making
12 commitments -- and again, this is where I
13 think this is a bit of a distortion in the
14 way that this is presented. We have stopped
15 short of committing to specific Public Safety
16 Power Shutoff numbers, because we can't
17 control the weather. But, we can control --
18 but, we do make commitments to the things
19 that we can control. And -- and if you would
20 indulge me just for 20 seconds, I want to
21 give a -- a brief example that will
22 illustrate this.

23 So we have a circuit called the
24 Arlene Circuit, which serves 1700 customers
25 in the City of Santa Clarita. In 2020, they
26 were impacted four times by Public Safety
27 Power Shutoffs. So as part of our Public
28 Safety Power Shutoff action plan that we've

1 been providing updates on every two weeks to
2 the Commission, we are going to have
3 covered -- covered conductor complete on the
4 Arlene Circuit by September 1st. So given
5 the same weather, the exact same weather,
6 with covered conductor, we would raise the
7 wind thresholds, and instead of having four
8 shutoffs, they would have one shutoff, and
9 the customer minutes of interruption would be
10 slashed by 92 percent. That, we can commit
11 to. But, we cannot commit to -- to
12 forecasting weather a year ahead of time, as
13 people have asked us to do, and then turn
14 around that argument on us to say that, well,
15 you won't commit to PSPS reductions. We're
16 committing to specific actions that will
17 absolutely improve PSPS, no matter what the
18 weather conditions are, but we just cannot
19 commit to the weather.]

20 COMMISSIONER GUZMAN ACEVES: And just
21 one other -- I heard two different data
22 points. One from TURN's presentation, which
23 the PD adopts in terms of capturing
24 95 percent of the high risk areas in the
25 budget accommodating covered conductors for
26 those areas, but you just mentioned in your
27 rebuttal that it would only mitigate
28 40 percent. Are you using a different

1 denominator there? Or what are those
2 differences?

3 MR. PAYNE: I think maybe the 40
4 percent you're thinking of was I was making
5 the point about how many circuits that have
6 been impacted by Public Safety Power Shutoffs
7 would be mitigated within the 2,750 miles as
8 opposed to the 6,250 miles that we requested.
9 If I'm getting your question right, that was
10 the 40 percent I think I used.

11 COMMISSIONER GUZMAN ACEVES: So you're
12 not referencing 40 percent high risk. You're
13 saying 40 percent is all circuits impacted by
14 PSPS?

15 MR. PAYNE: Yeah. That was just a
16 point that was just focused on the Public
17 Safety Power Shutoffs' potential that would
18 still remain if the PD stands and only 2,750
19 miles are done.

20 COMMISSIONER GUZMAN ACEVES: Okay.
21 Thank you very much.

22 ALJ SEYBERT: Before we move on to
23 other commissioner questions, are there any
24 other parties that would like to respond to
25 the questions posed by Commissioner Guzman
26 Aceves?

27 Commissioner Shiroma, I think I saw
28 your hand up.

1 COMMISSIONER SHIROMA: Yes. The
2 40 percent modeling addresses 94 percent of
3 wildfire risk. Estimate of the covered
4 conductors in providing 60 percent reduction
5 at -- but my question is this: As you have
6 been choosing lines to do the covered
7 conductor and I think I heard you say maybe
8 you're approaching 2,500 by the end of this
9 year.

10 (Phone disruption.)

11 MR. PAYNE: I'm sorry, Commissioner.
12 You broke up there. Can you say that last
13 part again?

14 COMMISSIONER SHIROMA: As your team is
15 choosing the lines to install the covered
16 conductors, aren't you prioritizing those
17 lines given all of the analysis that you've
18 done through the wildfire mitigation efforts,
19 through looking at where the PSPSs have
20 occurred and so forth?

21 MR. PAYNE: Yes, absolutely. And that
22 is the best and most rational way to get the
23 most risk reduction as quickly as possible.
24 And that was the purpose of the risk modeling
25 that we provided, which TURN has turned
26 around and used inappropriately. They've
27 drawn a line through that chart, which is a
28 (inaudible) risk chart that is intended to

1 say, "What are the highest risk circuits, and
2 which ones should we go after first as we
3 continue to deal with all the high risk
4 circuits?"

5 And it does not cover 94 percent of
6 the total risk as they would have you
7 believe. It absolutely does not. The tool,
8 as I mentioned, only models six hours of a
9 fire. So you can imagine that after six
10 hours, there are so many other variables.
11 How does the weather change? How many
12 firefighters are available? You know, all
13 the other things, which is why the risk
14 models, even the most current ones we have
15 today, don't model more than eight hours of a
16 fire. And the consequences that occur during
17 those six hours in this particular case are
18 the ones that are quantified by that risk
19 model. So it's a proxy for which are the
20 highest risk circuits to go and first.

21 But beyond six hours, I mean, think
22 about the Dixie Fire for example or any of
23 the 80 fires burning across the west that
24 have burned for far more than six hours. How
25 much destruction, how much danger, how many
26 lives were at risk after that first six
27 hours? So, again, just to reiterate, they're
28 using that data inappropriately.

1 And, Commissioner Shiroma, you're
2 correct. That data was made to show the
3 Commission that as we approach this
4 comprehensive covered conductor program in
5 our high-fire risk areas, we're in effect
6 (inaudible) by targeting the highest risk
7 circuits first. That's all it means.

8 ALJ SEYBERT: Thank you.

9 COMMISSIONER SHIROMA: The table in the
10 -- I'll call it the score. 6,849; 1,291; 371
11 included in the PD versus 6,809 --
12 (inaudible).

13 But in anyway --

14 (Phone disruption.)

15 MR. PAYNE: Yes. And, again, those are
16 proxies for relative risk. They do not
17 quantify total risk and consequences, and
18 they don't look at anything beyond six hours.

19 COMMISSIONER SHIROMA: Go ahead, Judge.
20 Back to you.

21 ALJ SEYBERT: Commissioner Houck, I see
22 your hand up.

23 Just before we turn to you, are
24 there any other parties that would like to
25 comment on this issue?

26 MS. TORRES: Can I respond, please?

27 ALJ SEYBERT: Yes.

28 MS. TORRES: Thank you. I can't speak

1 to the six-hour claim Mr. Payne is speaking
2 about right here, but I will --

3 ALJ SEYBERT: Apologies, Ms. Torres.

4 Just for the record, this is
5 Ms. Torres speaking.

6 MS. TORRES: Thank you.

7 We will certainly address that in
8 our comments on the proposed decision. The
9 main point I want to make is that if you look
10 at SCE's own model, all the circuits are
11 ranked. And TURN's proposal addresses the
12 highest risk circuits. Our analysis show
13 94 percent. Even if that's generous, our
14 proposal is addressing the highest risk
15 circuits.

16 And further 2,750 of covered
17 conductor is a ton of work to accomplish in
18 three years. And our proposal is targeting
19 the highest risk circuits within the time
20 available. Three years you have to replace
21 the conductor. You have to replace all the
22 poles. This is a lot of work. And it's an
23 insane amount of money. So we really need to
24 think about how to prioritize what we're
25 doing. And so TURN's proposal gets you the
26 most bang for the buck and the PD adopts even
27 more than TURN's proposal.

28 ALJ SEYBERT: Commissioner Houck?

1 COMMISSIONER HOUCK: Thank you, Judge
2 Seybert. So I've got three somewhat related
3 questions. One, the PD approves the
4 deployment of 2,750 circuit miles of covered
5 conductor over the time period of 2019 to
6 2023.

7 So first I wanted to ask Edison,
8 Mr. Payne, if Edison will be able to complete
9 that work within that timeframe by the end of
10 2023? And if we were to approve additional
11 circuit miles up to 6,272, is it realistic
12 that all of that work would even be able to
13 be completed by the end of 2023?

14 And then also you mentioned the cost
15 of undergrounding. And it sounds like you
16 just basically eliminated that as an option
17 totally based on cost. Are there portions of
18 your system that you think should be
19 undergrounded that are very high risk?

20 Because I would hate to approve
21 covered conductor here, and then in two --
22 the next GRC come back and hear that Edison
23 would like to be undergrounding certain
24 portions.

25 And then the last part of my
26 question just goes to, you know, SCE's
27 discussed absolute risk versus relative risk,
28 and I'm wondering how the parties believe the

1 Commission should balance reasonable rates
2 with the mitigation of risk for the wildfire
3 issues.

4 ALJ SEYBERT: Thank you. Let's start
5 with Mr. Payne. And then we'll turn it over
6 to the other parties.

7 MR. PAYNE: Thank you. Sorry. Just
8 making a few notes on those three questions.

9 Thank you, Commissioner Houck. Very
10 good questions all three. Can we complete
11 the work I believe was your first one.

12 Yes, we have spent the last three
13 years ramping up. I mentioned that we
14 brought in contractors that represent over
15 1,000 workers from all over the country.
16 Qualified electrical workers, 700 of them;
17 350 engineers; designers; planners; people
18 that will help us get this work done.

19 One of the concerns that Cal Pa had
20 originally made about our wildfire conductor
21 -- covered conductor plan was that we would
22 never be able to get it done. We can get it
23 done.

24 Up until today from 2013 -- from
25 2019 forward, we've done 1,800 miles already.
26 We have another 1,400 miles that is either in
27 construction or ready to be turned over for
28 construction. About 700 miles of it is in

1 construction as we speak today, which is why
2 I say that by the end of the year, we'll be
3 at 2,500 miles and we will have already
4 released (inaudible) 700, which would take us
5 up to 3,200 miles.

6 So we have ramped this program up
7 because of the urgency of this program and
8 the need that our communities have. And,
9 yes, we can accomplish this work. And we are
10 well on our way to do that.

11 Our biggest focus now is not having
12 to stop. Because having to go through this
13 entire ramp up all over again would be
14 incredibly costly for customers and would be
15 a big setback for our most effective program.

16 Your other question about
17 undergrounding was a good one. I didn't
18 mention all the details on undergrounding.
19 Our biggest program and most important
20 program is covered conductor because we
21 believe that is the most affordable way to
22 get risk reduction, and it has the best risk
23 spend efficiency.

24 But there are places and we did
25 include in our request certain places where
26 undergrounding would be appropriate. With
27 the higher costs that come on with
28 undergrounding, the places where you would

1 utilize a solution like that would be places
2 that for some reason are particularly higher
3 risk. So one example might be a canyon where
4 there is only one access and egress route and
5 people's lives would be more at risk than
6 they would be in any other place just because
7 it's hard to get out. Those are the kind of
8 places where we would use a more expensive
9 solution that provided a higher risk
10 reduction. And we have proposed a certain
11 number of miles in our overall wildfire
12 mitigation proposal for undergrounding. So
13 that's a really great question.

14 And then balancing reasonable rates
15 versus, you know, the risk of wildfires --
16 and, again, I would point to we just can't
17 look narrowly at the electric bill as the
18 only measure of what matters here. We have
19 the responsibility to deal with this crisis
20 that's right in front of us. And if we stall
21 and ask for more and more data, and we stop
22 putting in our most effective wildfire
23 mitigation measure, then we will end up
24 leaving an awful lot of risk out there. And
25 ultimately we're just not dealing with the
26 crisis that is right in front of us.

27 As I said at the beginning of my
28 rebuttal, there is nothing affordable about a

1 wildfire crisis. We -- collectively, we
2 can't wish it away. We can't look at it
3 narrowly in a way that convinces us that
4 going forward, we should do nothing. We need
5 to deal with it. We need to act boldly, and
6 we need to make these investments so that we
7 can operate 10,000 miles of safe overhead
8 infrastructure in the high-fire-threat
9 districts that Southern California Edison
10 serves.

11 ALJ SEYBERT: Thank you.

12 Would any other party representative
13 like to briefly address this issue? I want
14 to get to President Batjer's question as
15 well.

16 MS. TORRES: If I could speak?

17 ALJ SEYBERT: Yes, Ms. Torres.

18 MS. TORRES: This is Elise Torres for
19 TURN. We do acknowledge that SCE's proposal
20 would address more absolute risk. But the
21 additional circuit miles beyond TURN's
22 proposal would still be subject to a host of
23 other wildfire mitigation measures. And the
24 failure to deploy covered conductor in any
25 one location does not mean that no other
26 mitigation measures are in place for that
27 circuit.

28 And I'll just highlight that covered

1 conductor even once installed, there still
2 remains an estimated 40 percent of wildfire
3 risk. So it doesn't completely solve the
4 problem. And, again, that's why we need to
5 prioritize the highest risk circuits at this
6 time.

7 Thank you.

8 ALJ SEYBERT: Thank you.

9 President Batjer?

10 PRESIDENT BATJER: Thank you, Judge.

11 And thank you for those intervenors today as
12 well as for Edison's presentation.

13 In this calculation, if you will, of
14 risk -- and it seems like all of the IOUs do
15 approach this a bit differently when it comes
16 to covered conductor, veg management, and
17 undergrounding. And you all have very
18 different service territories and topography
19 and geography to deal with. I certainly
20 understand that.

21 But I've been out in the field a
22 little bit. And in some of the areas that
23 I've looked at for covered conductors to be
24 put in, it is my impression that there are
25 areas -- and you talked about, Mr. Payne,
26 about high winds and debris flying and so
27 forth.

28 But you know -- can you illustrate

1 to me at what point does a covered conductor
2 not work in terms of debris? Like when a
3 major branch blows into a wire, a covered
4 conductor? The wires can still break. It
5 can still be grounded if you will. And I
6 just wonder your risk evaluation in all of
7 these many, many miles that you have proposed
8 to do in the next -- well, between now and
9 2023? Well, I'll stop there.

10 I'm just wondering what your
11 evaluation is of what -- how strong, how
12 secure, how leaning out of the risk does the
13 covered conductor do in most cases or maybe
14 not all cases? My question is muddled. I
15 apologize.]

16 MR. PAYNE: No. That's okay. I think
17 I understand -- I think I understand what
18 you're getting at.

19 So I said in my opening comments
20 that covered conductor reduces 68 percent of
21 the risk; although, TURN would say that since
22 there's still 32 percent of the risk left
23 that you shouldn't do that covered conductor,
24 and you should only do the ones that have the
25 highest relative risk compared to other ones.
26 So just to set that aside for a minute.

27 But, what we've said is that with
28 bare conductor, what -- with regard to Public

1 Safety Power Shutoffs, we work with 31 miles
2 an hour sustained winds, 46 mile an hour
3 gusts, and that when we put covered conductor
4 on such a circuit that we would change the
5 wind thresholds to 40 miles an hour
6 sustained, and 58 mile an hour gusts. So
7 with -- and -- and almost every time it's the
8 gust speed that causes us to -- to
9 de-energize a circuit. And -- and so just --
10 that's one thing to keep in mind. So we're
11 talking about basically gale force winds
12 here. Right? And the reason why covered
13 conductor doesn't -- doesn't eliminate all
14 the risk is exactly what you said, President
15 Batjer, is that for most things that fly into
16 the lines, as long as they don't break the
17 conductor itself or break components on the
18 conductor or break a transformer or a piece
19 of equipment that's -- that is -- would be on
20 a pole, then it insulates the conductors from
21 each other, and it insulates from an object,
22 say, a tarp, from flying into the lines,
23 going across two of the wires, burning up,
24 causing a fire that falls to the ground, and
25 then gets swept along at, you know, many
26 miles an hour in gale force winds, and we all
27 know the results of that. Right? So covered
28 conductor doesn't eliminate all the risk,

1 because if you have a tree, for example, that
2 falls over into the lines and actually breaks
3 the wire, we're still better off with covered
4 conductor than we were without, because you
5 have a chance that there would be an ignition
6 on the ground, because you have the end of
7 the covered conductor that's now exposed, but
8 most -- most of the wire is -- is still
9 insulated. So -- so the reason it -- that
10 it -- that it isn't unlimited in terms of
11 protection it provides is that there are
12 still things that can -- that can
13 mechanically damage to the wires or the
14 components. But, I will say that that's why
15 we have other aspects of our wildfire
16 mitigation program that address those things,
17 like the hazard tree mitigation program,
18 which looks at trees that are taller than
19 they are far from our lines that, if they
20 fell over in high winds, would fall in and
21 damage our wires. So there are other ways
22 that we try to manage those risks. But, you
23 are correct that it provides a lot of
24 protection. It allows us to operate at more
25 and more extreme conditions, but it's not
26 unlimited, because you can still have
27 mechanical damage to the overhead
28 infrastructure. Does that make sense?

1 PRESIDENT BATJER: Yes. That's very
2 helpful, and I -- I appreciate the -- the
3 greater detail on -- on the risk and the
4 mitigation of the risk. And I do appreciate
5 your explanation to Commissioner Houck on
6 what you can accomplish within the timeframe
7 of this GRC, because that was somewhat -- not
8 settling, but a question whether all of this
9 could be done.

10 You have used the phrase a couple of
11 times that all would be stopped, or you'd
12 have to restart. This -- this proposed
13 decision, as is, doesn't stop you. It
14 just -- it -- it -- I would think. So I'm a
15 little confused when you said, "All this
16 planning we've done, we'd have to restart
17 it." Do you mean -- well, what do you mean
18 by that?

19 MR. PAYNE: Yeah. I mean what this PD
20 says is that it -- that it proposes to fund,
21 as reasonable, 2750 miles of covered
22 conductor. So that's the scope that the
23 Commission finds reasonable based on all the
24 evidence that's been presented, if -- if
25 that's the way the -- the -- if the PD were
26 to be adopted. So I take that as a very
27 strong signal that the Commission is not
28 inviting me to go ahead and execute my

1 covered conductor program in its entirety the
2 way that I think would be prudent for us to
3 do to -- to respond to this risk. I take
4 that very seriously as the Commission telling
5 me "You're doing too much too fast." And as
6 I've said, I completely disagree with that,
7 for all the reasons that I've said, that the
8 two dollars a month per customer to do as
9 much as we have proposed within this
10 timeframe does not suddenly make this
11 unaffordable, and even if it did, the costs
12 of doing nothing and the cost of not
13 mitigating wildfire risk, as we all know -- I
14 mentioned two of our fires one year apart
15 that were \$6 billion in claims -- if you look
16 to the north to PG&E, and there were tens of
17 billions of dollars in claims. So we --
18 again, that's why I say we just can't look at
19 this too narrowly. We have to deal with the
20 crisis in front of us, and -- and we have to
21 do what's necessary now. I think it -- I
22 think we owe it to customers to -- you know,
23 to -- Ms. Torres was saying that we could
24 just go ahead and keep spending, and maybe
25 come back later and ask for -- for that
26 approval. Look, I think we need to be honest
27 with consumers about what we're doing, about
28 why we're doing it. I think it needs to get

1 funded in rates so that we aren't carrying
2 huge unfunded balances without any certainty
3 of -- of recovery, and we need to head-on
4 address this wildfire crisis and be honest
5 with customers about what it costs. I think
6 this opportunity to snowplow costs out into
7 the future, postpone rate increases that we
8 know are coming or that we -- or that should
9 be coming, in the case of covered conductor,
10 I think it's just a -- I think it's a
11 mistake. I think customers expect more from
12 us than that.

13 ALJ SEYBERT: Thank you. And I'll
14 point out we're now at our 3:00 p.m. stop
15 time, but I do want to ask, do any of the
16 other commissioners have questions before we
17 close?

18 (No response.)

19 ALJ SEYBERT: Okay. Thank you. We
20 look forward to reviewing party comments on
21 the proposed decision, which are due this
22 Thursday, July 29th. Thank you to the
23 commissioners and the parties for your
24 participation today.

25 This concludes today's oral
26 argument. Off the record.

27 (Whereupon, at the hour of 3:01
28 p.m., the Commission then adjourned.)]

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

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JASON A. STACEY
CSR NO. 14092

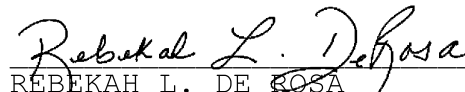
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