



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

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Application of Southern California Edison
Company (U 338-E) Regarding 2022 Risk
Assessment Mitigation Phase.

Application 22-05-013

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
PRE-HEARING CONFERENCE STATEMENT

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**Southern California Edison Company's (U 338-E)
Pre-Hearing Conference Statement**

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SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E)
PRE-HEARING CONFERENCE STATEMENT

I.

INTRODUCTION

Pursuant to the July 7, 2022 Ruling Setting Pre-hearing Conference (PHC) issued by Administrative Law Judge (ALJ) Lirag in this proceeding (Ruling), Southern California Edison Company (SCE) respectfully submits its PHC Statement. SCE looks forward to discussing these matters in greater detail at the PHC on August 15, 2022.

II.

SCOPE OF PROCEEDING

SCE’s Reply to Protests to RAMP Report (Reply to Protests), dated June 30, 2022, addressed several issues regarding the appropriate scope of this proceeding. For example, SCE showed that the “power law” recommendations that Mussey Grade Road Alliance (MGRA) seeks to inject into this proceeding have already been considered and resolved by the Commission.¹ SCE also demonstrated that MGRA’s proposal for including smoke health impacts in the wildfire consequence calculation is better-suited for a multi-party proceeding.²

In responding to the protest filed by the Public Advocates Office (Cal Advocates), SCE showed that any broader consideration of the adequacy of the currently-established performance metrics appears to be beyond the appropriate scope of this proceeding.³ SCE also demonstrated that Cal Advocates’ assertion that

¹ SCE Reply to Protests, p. 3.

² Reply to Protests, pp. 3-4.

³ Reply to Protests, p. 6.

the concept of “inadequate inspections” should be litigated in this RAMP proceeding is inappropriate and out of scope.⁴

For full details regarding scoping issues as framed by the protests to SCE’s Application, SCE respectfully refers to its Reply to Protests. SCE also notes that the Commission has provided guidance regarding the limited scope of what is to be resolved in RAMP proceedings. For example, the Commission’s decision that closed out SCE’s last RAMP proceeding stated the following: “Proposed spending for risk mitigation programs is to be reviewed in SCE’s TY 2021 GRC application.”⁵ As ALJ Lirag aptly stated in a previous Sempra RAMP Pre-hearing Conference, “[n]ormally, you don’t do orders or ordering paragraphs in the RAMP, other than to make very undisputed findings.”⁶

Accordingly, and consistent with the April 17, 2020 Amended Scoping Memo and Ruling of Assigned Commissioner and Assigned Administrative Law Judges in A.19-08-013 (Amended Scoping Memo), SCE believes the appropriate scope of this proceeding should be as follows:

- A Safety Policy Division (SPD) review of SCE’s 2022 RAMP Report and its issuance of a regulatory review report consistent with the requirements of D.14-12-025 and D.20-01-002 and any other applicable Commission guidance; and
- SCE and intervenor/party feedback on SPD’s report, and intervenor/party feedback on SCE’s RAMP Report.

As outlined in our June 22, 2022 Reply to Protests, the Commission should not include extraneous issues in the scope in this proceeding.

⁴ Reply to Protests, p. 7.

⁵ D.20-10-004, p. 19, Finding of Fact No. 8.

⁶ Transcript (“Tr.”) of February 26, 2020 Prehearing Conference in I.19-11-010 (Tr. at 34:27-28 – 35:1 (ALJ Lirag)). *See also* D.18-04-016, p. 5.

III.

PROCEDURAL SCHEDULE

SCE recommends that the procedural schedule that was outlined in SCE’s Application and informed by the Amended Scoping Memo be adopted by the Commission.⁷ Any guidance from the Commission in this RAMP proceeding that would be applicable to SCE’s Test Year 2025 General Rate Case (GRC) Application should be issued in sufficient time to permit SCE to incorporate such guidance into that Application in an orderly and efficient manner. This is entirely consistent with the Commission’s Rate Case Plan.⁸ SCE’s GRC Application is due in May 2023, approximately nine months from now. Development of SCE’s 2025 GRC filing is already materially underway.

IV.

REPRESENTATIVE SPEAKERS AT PHC

The Ruling directs that SCE “coordinate with parties and provide a list of all representative speakers at least 7 days prior to the PHC.” SCE submitted the referenced list, including contact information, on August 8, 2022.

V.

EVIDENTIARY HEARINGS ARE NOT NECESSARY

In its Protest to SCE’s RAMP Application, TURN concurred with SCE that evidentiary hearings are not necessary in this proceeding.⁹ Cal Advocates’ Protest stated that “[a]t this time, and given the experience in previous RAMP proceedings, Cal Advocates does not anticipate a need for hearings in the instant matter.”¹⁰ SCE agrees.

⁷ On June 22, 2022 SCE sent an email to counsel for Cal Advocates and The Utility Reform Network (TURN) proposing a compromise schedule in response to the Protests filed by those organizations. Neither organization substantively responded to SCE’s proposal.

⁸ The Rate Case Plan Decision states that the Commission’s intent with respect to the timing of the RAMP filing is to “create additional time for SED and parties to complete their review of the utility’s RAMP farther in advance of the subsequent GRC filing date, *so that the utility has as much time as possible to meaningfully incorporate the results of this review in its GRC application.*” D.20-01-002, p. 48 (emphasis added).

⁹ TURN Protest to Application, p. 7.

¹⁰ Cal Advocates Protest to Application, p. 3.

VI.

CATEGORIZATION OF PROCEEDING

SCE believes that, consistent with past practice in RAMP applications, this proceeding should be categorized as ratesetting.

VII.

TECHNICAL ITEMS RELATED TO ACCESS TO DETAILED DATA AND WORKPAPER

MATERIAL

In preparing SCE's 2022 RAMP, SCE took into consideration feedback from the Commission and intervening parties in connection with our previous RAMP proceeding as well as those of the other IOUs; such feedback included requests for more detailed and granular risk analyses. In our current RAMP, SCE has provided risk spending efficiency (RSE) scores and analytical data at the circuit segment-level and/or structure level for the Wildfire, Contact with Energized Equipment (CEE) – Wires Down, and Underground Equipment Failure (UEF) RAMP risks. Moreover, we have provided RSEs and analytical data at the circuit level for Public Safety Power Shutoff (PSPS) when analyzed as a RAMP risk. This detailed provision of information necessarily resulted in a large data file with more than 5 million individual RSEs, which SCE has been made aware was causing parties to experience certain challenges opening and working with the information due to the file size. Once SCE was made aware of these challenges, we worked diligently to provide additional information and tools to parties to facilitate their review of our RAMP.¹¹

SCE remains committed to collaboratively working with parties to ensure access to and understanding of our RAMP analysis.

¹¹ For example, SCE has split this large file into smaller more manageable files. SCE has also created a cloud-based visualization-only tool utilizing Power BI that parties can use to view the individual and tranche-level RSEs. In addition to the Power BI tool, SCE provided additional files for Wildfire (wildfire covered conductor program and targeted undergrounding), PSPS, CEE and UEF that provide detailed calculations for the RSEs to parties. SCE notified the service list when these files were posted to our website.

Respectfully submitted,

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