



COM/GSH/mef 9/19/2022

FILED

09/19/22

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

PHAM

A2205013

Application of Southern California
Edison Company (U338E) Regarding
2022 Risk Assessment Mitigation
Phase.

Application 22-05-013

ASSIGNED COMMISSIONER'S SCOPING MEMO AND RULING

Summary

This Scoping Memo and Ruling (Scoping Memo) sets forth the category, issues to be addressed, and schedule of the proceeding pursuant to Public Utilities (Pub. Util.) Code § 1701.1 and Article 7 of the Commission's Rules of Practice and Procedure (Rules).

1. Background

On May 13, 2022, Southern California Edison Company (SCE) filed Application (A.) 22-05-013 to submit its Risk Assessment and Mitigation Phase (RAMP) Report pursuant to Decision (D.) 14-12-025.

SCE's RAMP Report provides an assessment and mitigation of key safety risks facing the company for the years 2025 to 2028. SCE's RAMP submission (a) describes SCE's top safety risks; (b) explains how SCE analyzes and prioritizes each safety risk; and (c) evaluates mitigation activities for each risk which includes providing risk spend efficiency scores.

The RAMP Report follows the latest guidelines set forth in D.18-12-014 and D.21-11-009 for what the RAMP submission should include.

The Commission's Safety Policy Division (SPD) is required to review SCE's RAMP Report and issue an evaluation report. Parties shall then be given an

opportunity to file comments to SCE's RAMP Report and SPD's evaluation report. The RAMP filing and comment process shall then form the basis of SCE's assessment and proposed mitigations for its safety risks in its next general rate case (GRC) filing.¹

A pre-filing workshop was held on December 6, 2021.

Responses to the application were filed by Mussey Grade Road Alliance (Mussey Grade) and Small Business Utility Advocates (SBUA) on June 13, 2022.

Protests to the application were filed by The Public Advocates Office (Cal Advocates) and The Utility Reform Network (TURN) on June 20, 2022.

SCE filed a Reply to the protests and responses on June 30, 2022.

On August 15, 2022, a prehearing conference (PHC) was held to address the service list, discuss the scope, schedule, and other procedural matters.

On August 22, 2022, separate Briefs were filed by Mussey Grade, SBUA,² Cal Advocates, and SCE concerning the inclusion of additional issues into the scope of the proceeding. These issues were discussed at the PHC but the inclusion or exclusion of such issues are being contested. SCE filed its Reply Brief on Additional Scoping Issues on September 1, 2022.

2. Scope

Based on the application, PHC statements, discussion during the PHC, and briefs filed by several parties, the scope of issues to be addressed in this proceeding are as follows:

1. Whether SCE's RAMP submission is complete and in compliance with D.14-12-025, D.21-11-009, the Safety Model Assessment Proceeding settlement agreement

¹ SCE's Test Year 2025 GRC is scheduled to be filed by May 15, 2023.

² SBUA's filed a Response to the Administrative Law Judge (ALJ) requested briefing.

- adopted in D.18-12-014, and other relevant decisions involving RAMP.
2. Whether there are gaps in the RAMP Report in identifying risks and considering mitigation options.³
 - a. Whether SCE evaluates the effect of inadequate inspections to existing risks;
 - b. Whether SCE assesses harm to customers from de-energization events such as Public Safety Power Shutoff events;
 - c. Whether SCE should explore the use of power law functions to model wildfire risks in this RAMP and/or in its future RAMPs;
 - d. Whether wildfire smoke should be considered as a safety risk in this RAMP and/or in its future RAMPs; and
 - e. Whether risk reduction and risk-spend efficiency should be established for Rapid Earth Fault Current Limiter prototyping and developments in this RAMP and/or in its future RAMPs.
 3. Whether the utility's analysis is transparent and allows for independent validation of its results.
 4. Whether RAMP feedback has been meaningfully evaluated, and when appropriate, incorporated into SCE's GRC filing.
 5. Whether the Application aligns with or impacts the achievement of any of the nine goals of the Commission's Environmental and Social Justice Action Plan.

³ As discussed during the PHC, this scoping issue includes other sub-issues that have been proposed by intervenors and these will not be specifically enumerated in this scoping memo. Instead, the sub-issues specifically mentioned are those that were disputed by parties and which the assigned Commissioner has deemed to be part of the scope for this proceeding.

3. Schedule

The following schedule is adopted but may be modified by the assigned Commissioner or ALJ as required to promote the efficient and fair resolution of this proceeding:

Event	Date
SPD Serves Report on SCE's RAMP Submission	October 2022 (4 th week)
Post-SPD Report Workshop	November 2022 (1 st week)
Additional Workshops (if necessary)	November 2022
Opening Comments on RAMP Submission and SPD Report	December 2, 2022
Reply Comments	December 23, 2022
Filing of SCE's Test Year 2025 GRC	May 15, 2023
SCE GRC PHC	June to July 2023
Decision Closing Application or Integration of RAMP into GRC	3 rd Quarter 2023

In any event, we intend that this proceeding will be resolved no later than 18 months from the filing of the application.

4. Category of Proceeding, Hearings, and *Ex Parte* Restrictions

The proceeding was preliminarily categorized as ratesetting, and there were no objections to the category during discussions at the PHC. This ruling affirms that this is a ratesetting proceeding. Accordingly, *ex parte* communications are restricted and must be reported pursuant to Article 8 of the Commission's Rules.

Based on discussions at the PHC concerning the scope and schedule of the proceeding, it is determined that hearings are not necessary.

5. Public Outreach

Pursuant to Pub. Util. Code § 1711(a), I hereby report that the Commission sought the participation of those likely to be affected by this matter by noticing it in the Commission's monthly newsletter. The newsletter is served on communities and businesses that subscribe to it and is posted on the Commission's website.

6. Intervenor Compensation

Pursuant to Pub. Util. Code § 1804(a)(1), an intervenor who intends to seek an award of compensation must have filed and served a notice of intent to claim compensation by September 14, 2022, or 30 days after the PHC.

7. Response to Public Comments

Parties may, but are not required to, respond to written comments received from the public. *See* Pub. Util. Code § 1701.1(g). Parties may do so by posting such response using the "Add Public Comment" button on the "Public Comment" tab of the docket card for the proceeding.

8. Public Advisor

Any person interested in participating in this proceeding who is unfamiliar with the Commission's procedures or has questions about the electronic filing procedures is encouraged to obtain more information at <http://consumers.cpuc.ca.gov/pao/> or contact the Commission's Public Advisor at 1-866-849-8390 or 1-415-703-2074 or 1-866-836-7825 (TTY), or send an e-mail to public.advisor@cpuc.ca.gov.

9. Service of Documents on Commissioners and Their Personal Advisors

The official service list has been created and is on the Commission's website. Parties should confirm that their information on the service list is correct

and serve notice of any errors on the Commission's Process Office, the service list, and the ALJ. Persons may become a party pursuant to Rule 1.4.

When serving any document, each party must ensure that it is using the current official service list on the Commission's website.

This proceeding will follow the electronic service protocol set forth in Rule 1.10. All parties to this proceeding shall serve documents and pleadings using electronic mail, whenever possible, transmitted no later than 5:00 p.m., on the date scheduled for service to occur. Rule 1.10 requires service on the ALJ of both an electronic and a paper copy of filed or served documents.

When serving documents on Commissioners or their personal advisors, whether or not they are on the official service list, parties must only provide electronic service. Parties must not send hard copies of documents to Commissioners or their personal advisors unless specifically instructed to do so.

Persons who are not parties but wish to receive electronic service of documents filed in the proceeding may contact the Process Office at process_office@cpuc.ca.gov to request addition to the "Information Only" category of the official service list pursuant to Rule 1.9(f).

The Commission encourages those who seek information-only status on the service list to consider the Commission's subscription service as an alternative. The subscription service sends individual notifications to each subscriber of formal e-filings tendered and accepted by the Commission. Notices sent through subscription service are less likely to be flagged by spam or other filters. Notifications can be for a specific proceeding, a range of documents and daily or weekly digests.

10. Receiving Electronic Service from the Commission

Parties and other persons on the service list are advised that it is the responsibility of each person or entity on the service list for Commission proceedings to ensure their ability to receive e-mails from the Commission. Please add “@cpuc.ca.gov” to your e-mail safe sender list and update your e-mail screening practices, settings and filters to ensure receipt of e-mails from the Commission.

11. Assignment of Proceeding

Commissioner Genevieve Shiroma is the assigned Commissioner and Rafael L. Lirag is the assigned ALJ for the proceeding.

IT IS ORDERED that:

1. The scope of this proceeding is described above and is adopted.
2. The schedule of the proceeding is set forth above and is adopted.
3. Evidentiary hearings are not needed.
4. The category of the proceeding shall be ratesetting.
5. *Ex Parte* rules as set forth in Rules 8.1-8.5 of the Commission’s Rules of Practice and Procedure, and Public Utilities Code § 1701.3(c) apply.
6. The assigned Commissioner or assigned Administrative Law Judges may modify the schedule, as required to promote the efficient and fair resolution of the proceedings.

This order is effective today.

Dated September 19, 2022, at San Francisco, California.

/S/ GENEVIEVE SHIROMA

Genevieve Shiroma
Assigned Commissioner