



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

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Order Instituting Rulemaking to Consider
Strategies and Guidance for Climate Change
Adaptation.

Rulemaking 18-04-019

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
OPENING COMMENTS ON COMMENTS OF THE DISADVANTAGED
COMMUNITIES ADVISORY GROUP ON THE ENERGY DIVISION STAFF
PROPOSAL ON UTILITY CLIMATE ADAPTATION PLANNING

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Pursuant to the Assigned Commissioner’s Ruling Entering Comment Letter of the Disadvantaged Communities Advisory Group (DACAG) Into the Record and Opportunity to Comment (Ruling), Southern California Edison Company (SCE) submits the following comments.

I.

SCE’S COMMENTS

On September 21, 2026 the DACAG submitted comments on the California Public Utilities Commission’s (CPUC) Staff Proposal on Community Engagement and Adaptive Capacity (Staff Proposal) within the Climate Adaptation proceeding strongly supporting the Staff Proposal’s effort to strengthen community engagement, incorporate community adaptive capacity into climate adaptation planning, and ensure that the communities most affected by climate change have a meaningful role in shaping the utilities’ response.¹ As discussed in SCE’s

¹ DACAG. Comments Of The Disadvantaged Communities Advisory Group On The Energy Division Staff Proposal On Utility Climate Adaptation Planning. p. 1.

opening and reply comments on the Staff Proposal that were filed on August 6 and August 13, 2026, respectively, SCE supports meaningful engagement with disadvantaged and vulnerable communities, tribal nations, and at-risk communities in partnership with local community organizations to increase literacy, understanding, and awareness of climate adaptation risk, and agrees that engagement feedback can provide valuable input into utilities' climate adaptation assessment process. SCE has addressed many of the arguments discussed in the DACAG's comments in our opening and reply comments on the CPUC Staff Proposal, especially regarding the distinction between IOU climate adaptation and community climate adaptation. For example, DACAG's comments assert the Commission should require the IOUs to demonstrate how community engagement directly informed investment decisions² – SCE's opening comments emphasize that 1) the Phase 1 Decision specifically states the purpose of the Climate Adaptation and Vulnerability Assessment (CAVA) is to assess risks to utility infrastructure and operations, not risks to communities, and 2) community adaptive capacity metrics lack the technical rigor and spatial granularity to serve as the sole or primary determinative input into investment planning or to otherwise directly shape investment decisions.³ Here, SCE responds to limited portions of the DACAG's comments to supplement our previous comments submitted to the record.

A. SCE Completes Extensive Community Engagement to Groundtruth its CRM, Which is Calculated Based on Technical Data from Public Sources

While the CAVA vulnerability assessment remains a technical, data-driven process, SCE has conducted extensive community engagement to inform and validate its Community Resilience Metric (CRM), ensuring community perspectives are meaningfully incorporated into adaptation planning.

SCE has devoted significant time to engaging the communities in our service area through the Climate Resilience Leadership Group and other engagement activities. The

² DACAG comments, p. 4.

³ SCE Opening Comments on Staff Proposal, p.17.

DACAG’s description of substantial community input on CAVA results being disregarded mischaracterizes the way the CAVA process works.⁴ As SCE shared during the September 25, 2025, CPUC Climate Adaptation Equity Workshop, the CAVA is a technical assessment that identifies at-risk assets based on physical vulnerability and reliability consequences. Specifically, the CAVA process takes in climate exposure data and technical asset sensitivity information to identify vulnerable assets, then estimates the potential consequences of those asset vulnerabilities to arrive at a prioritized list of vulnerabilities. Since these are fully technical steps, community input is not used to identify climate vulnerabilities. Community input ground-truths SCE’s CRM scoring, our adaptive capacity metric built through a desktop exercise consisting of 37 publicly available data indicators at the census block group level (See Table 1 in the following section for list of indicators used in the CRM). The CRM is then used across SCE as one of many factors to prioritize comparable adaptation investments. Therefore, SCE believes community input is meaningfully considered at the appropriate step in the process without undue burden on community members.

B. IOU Investments Improve Electric Reliability and Resiliency, Whereas CRM Evaluates Sensitivity and Adaptive Capacity Unrelated to Electric Service

While the CRM can inform electric system upgrades, SCE emphasizes these upgrades *do not* on their own improve the adaptive capacity of the community. Improvements to reliability and resiliency of electric service will offer critical benefits to communities, but strengthening the adaptive capacity of a community is beyond the scope of electric service.

DACAG suggested in their filed comments that IOU reporting should quantify the impacts of CAVA investments on community adaptive capacity.⁵ However, community adaptive

⁴ DACAG comments p.3: “If utilities are asking communities to devote substantial time to identifying climate vulnerabilities and adaptation priorities, but those priorities do not meaningfully inform the investments that follow, the Commission risks creating a process that is participatory in form but not in substance.”

⁵ DACAG recommendation 5: “The outcome and benefits metrics should be aligned with the CAVA metrics used to identify adaptive capacity in the first place. For example, if an investment is targeted towards a community with a low adaptive capacity metric, how and by how much did the investment

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capacity metrics are constructed in a way that would make any such attempt at quantification misleading at best, if not fully infeasible. Community adaptive capacity metrics aggregate diverse types of socioeconomic indicators from public sources. For example, the indicators used in SCE's CRM are listed in Table 1 below. These indicators are obtained from publicly available sources such as the United States Census Bureau, the CA Healthy Places Index, the U.S. Geological Survey's National Land Cover Database, and the Center for Disease Control's PLACES index. These metrics were chosen based on a literature review of academic, nonprofit, and government reports measuring resiliency. Indicator choice was further developed through working sessions with environmental and social justice experts from various non-profits, government organizations, and academia,⁶ and SCE's CRM was further evaluated by Sandia National Laboratories.⁷

improve the community's score on that metric? For qualitative metrics, a qualitative description of change in benefits can be included."

⁶ For more information, see SCE's recent CAVA, Appendix B, pp.238-240.

⁷ Hart et al. Integration of equitable resilience metrics into climate-informed electric utility planning processes: phase one. Sandia National Laboratories Technical Report. November 1, 2024. <https://www.osti.gov/biblio/2477038>.

Table 1. Sensitivity and Adaptive Capacity indicators that make up SCE's CRM.

Sensitivity	
Domain	Indicators
Built Environment	CalEnviroScreen pollution burden, noise pollution
Health	Asthma, cardiovascular disease, children, diabetes, disability, health insurance, medical baseline (%)
Housing	Group quarters, housing burdened low-income households, housing quality, mobile homes, renters
Socio-Economic	Educational attainment, unemployment, poverty, race/ethnicity, elderly living alone, single female head of household, foreign born, linguistic isolation, outdoor workers, rural communities, Tribal and Indigenous land (%)
Adaptive Capacity	
Domain	Indicators
Community Built Environment	Permeable surface cover, tree canopy and green space
Governance and Services	Number of cooling centers, number of medical facilities per person, planning level, supermarket access, urgent care facilities, voters
Individual Built Environment	Homes with air conditioning (%), homes with telecommunications access (%)
Transportation	Transit access, vehicle access

While these indicators broadly reflect community characteristics and can be used to directionally indicate where a community may be more vulnerable to a loss of electric service, that relationship is not a closed loop. Specifically, increased grid reliability in a particular area does not directly translate into improved scores on the indicators listed in Table 1 above, and certainly not on a timescale that can be directly tied to a specific grid investment, especially given that these indicators are obtained from public sources that are updated periodically and reflect changes over time. Moreover, these indicators are typically available at the geographic granularity of census tracts or census block groups. As SCE discussed in our Opening Comments on the Staff Proposal, filed August 6, 2026, this level of geographic granularity does not neatly correspond to the geographic reach of electrical infrastructure and the locational distribution of the customers it serves. Therefore, while adaptation investments made by SCE may improve reliability for communities in a particular location, the already tenuous connection between that

benefit and any of the indicators listed in Table 1 would be further attenuated by aggregation to the geographic level of a census block group or census tract. Independent researchers have validated that significant limitations exist in the ability of available equity metrics to capture the impact of resilience events or lack thereof, and that improvements in such metrics largely depend on investments or actions that are beyond the scope of energy utilities.⁸ Significant caution is therefore warranted on the extent to which community adaptive capacity metrics can be used to guide utility investment decisions or reflect the benefits of those investments.

II.

CONCLUSION

SCE appreciates the opportunity to provide these comments.

Respectfully submitted,

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⁸ Hart et al (2024).