



Public Advocates Office
California Public Utilities Commission

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PUBLIC ADVOCATES OFFICE DATA REQUEST

Proceeding: 2021 Wildfire Mitigation Plans

No. CalAdvocates-BVES-2021WMP-05

Date: June 14, 2021

Response requested: June 17, 2021

To: **Paul Marconi**

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INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5(e) and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission’s Rules of Practice and Procedure. Restate the text of each request prior to providing the response. Identify the person providing the answer to each Data Request and their contact information.

Please send your response to the Originator and e-copies to the following Public Advocates Office representatives:

Patricia.ma@cpuc.ca.gov

Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Originator before the response to the Data Requests is due and provide a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. Please identify the person who will be providing the response and their phone number and email address.

Responses should be provided in the original electronic format, if available, and if not, in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to these Data Request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the Data Requests should be Bates-numbered and, if voluminous, indexed. Responses to Data Requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

For any questions, email the Public Advocates Office contact(s) above with a copy to the Public Advocates Office attorney. If you are unable to answer a question completely, accurately, and with the specificity requested, notify the Public Advocates Office as soon as possible. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

DEFINITIONS

- A. As used herein, the terms “you,” “your(s),” “Company,” and “SCE” mean Southern California Edison Company and any and all of its respective present and former employees, agents, consultants, attorneys, and officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January

1 through January 31” should be understood to include both the 1st of January and the 31st of January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

- D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these Data Requests any information or documents which might otherwise be considered to be beyond their scope.
- E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- F. The terms “document,” “documents,” or “documentary material” include, without limitation, the following items, whether in electronic form, printed, recorded, or written or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions, orders, intra-office and interoffice communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, calendars, work papers, graphs, notebooks, notes, charts, computations, plans, drawings, sketches, computer printouts, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, bulletins, records or representations or publications of any kind (including microfilm, videotape, and records however produced or reproduced), electronic or mechanical or electrical records of any kind (including, without limitation, tapes, tape cassettes, discs, emails, and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, and discs and recordings used in automated data processing, together with the programming instructions and other material necessary to translate, understand, or use the same), and other documents or tangible things of whatever description which constitute or contain information within the scope of these data requests
- G. “Relate to,” “concern,” and similar terms and phrases shall mean to consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these Data Requests.
- H. “Identify”:
 - i. When used in reference to a person, includes stating their full name, most recent known business address and telephone number, and present title or position;
 - ii. When used in reference to documents, includes stating the nature of the document (e.g., letter, memorandum), the date (if any), the title of the document, the identity of the author and/or the document, the location of the document, the identity of the person having possession, control, or custody of the document, and the general subject matter of the document.

- I. When requested to “state the basis” for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.
- J. “WMP” means Wildfire Mitigation Plan.

DATA REQUESTS

The following questions relate to BVES’s Revised 2021 WMP submitted on June 3, 2021, and reference Cal Advocates’ Excel file provided as an attachment to this data request -- **“BVES_2020_Q4_Table12_Revision_20210603_Cal_Advocates_Analysis, Tab 2: Pivot Table”** (“Attachment”). This Excel file uses data provided in Table 12 of the BVES’s Revised 2021 WMP.

Question 1

BVES’s Revised Table 12 contains a number of initiatives that share the same dollar amount for 2020 actual expenditures. For example, 17 separate wildfire mitigation initiatives have the same balance of \$9,086 reported for the 2020 Actual Operating Expenditures (see Attachment, Column D, Cells 45-61).

- a) For *each* group of initiatives that share the same dollar amount for 2020 actual expenditures, as described above,
 - i. Explain why the initiatives have the exact same dollar amount.
 - ii. Explain why BVES’s expenditure recording methodology for this group of initiatives is reasonable.
- b) For 2021 and 2022 *actual* expenditure reporting in future WMPs, does BVES expect to have multiple initiatives with the same dollar amount, similar to what is described above?
- c) If the answer to b) above is yes, please explain and reconcile BVES’s response with its statement regarding disaggregation of expenditures as noted below by the WSD in its May 4, 2021 Revision Notice:

On July 13, 2020, BVES sent the WSD a letter in accordance with Ordering Paragraph 11 of Resolution WSD-002, in which it stated that, “BVES does not have any wildfire mitigation measures in its Wildfire Mitigation Plan that cannot be disaggregated.” (footnote excluded)

Question 2

BVES’s Revised Table 12 contains a number of initiatives that share the same dollar amount for 2021 projected expenditures. For example, 11 separate wildfire mitigation initiatives have the same projected expenditure amount of \$6,873 (see Attachment, Column E).

- a) For *each* group of initiatives that share the same dollar amount for 2021 projected expenditures, as described above,
 - i. Explain why the initiatives have the exact same dollar amount.
 - ii. Explain why BVES’s budget projection methodology for this group of initiatives is reasonable.
- b) For the initiatives that have the same projected dollar amount, as described above, is BVES tracking the 2021 expenditures for each of those initiatives separately?
- c) If the answer to b) above is no, please explain and reconcile BVES’s response with its statement regarding disaggregation of expenditures as noted below by the WSD in its May 4, 2021 Revision Notice:

On July 13, 2020, BVES sent the WSD a letter in accordance with Ordering Paragraph 11 of Resolution WSD-002, in which it stated that, “BVES does not have any wildfire mitigation measures in its Wildfire Mitigation Plan that cannot be disaggregated.” (footnote excluded)

Question 3

BVES’s Revised Table 12 contains a number of initiatives that share the same dollar amount for 2022 projected expenditures. For example, 11 separate wildfire mitigation initiatives have the same projected expenditure amount of \$7,137 (see Attachment, Column F).

- a) For *each* group of initiatives that share the same dollar amount for 2022 projected expenditures, as described above,
 - i. Explain why the initiatives have the exact same dollar amount.
 - ii. Explain why BVES’s budget projection methodology for this group of initiatives is reasonable.
- b) For the initiatives that have the same projected dollar amount, as described above, will BVES be tracking the 2022 expenditures for each of those initiatives separately?
- c) If the answer to b) above is no, please explain and reconcile BVES’s response with its statement regarding disaggregation of expenditures as noted below by the WSD in its May 4, 2021 Revision Notice:

On July 13, 2020, BVES sent the WSD a letter in accordance with Ordering Paragraph 11 of Resolution WSD-002, in which it stated that, “BVES does not have any wildfire mitigation measures in its Wildfire Mitigation Plan that cannot be disaggregated.” (footnote excluded)

END OF REQUEST