

**DOCKETED**

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**SCE Comments on Workshop on Climate Adaptation**

*Additional submitted attachment is included below.*



**Catherine Hackney**  
Director, Regulatory Affairs

August 22, 2019

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 19-IEPR-10  
1516 Ninth Street  
Sacramento, CA 95814-5512  
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission  
Docket No. 19-IEPR-10: IEPR Workshop on Climate Adaptation

Dear Commissioners:

On August 8, 2019, the California Energy Commission (CEC) hosted the *IEPR Commissioner Workshop on Climate Adaptation in California's Energy Sector* (Workshop) as part of the CEC's 2019 Integrated Energy Policy Report (IEPR) Proceeding. The Workshop explored energy sector climate adaptation in California through two sessions focused on community resilience needs and collaborative research.

SCE appreciates the opportunity to submit these comments on the Workshop to present our perspective on the role of utilities, state and local governments, and community stakeholders in helping the energy sector adapt to a changing climate.

As the companies responsible for operating and maintaining power distribution systems, utilities should identify which pieces of their infrastructure are most vulnerable to climate change impacts such as extreme temperature, wildfires, and severe weather. Then, the utilities can develop a mitigation plan to increase the resilience of these pieces of infrastructure and reduce the risk of service disruption. For example, in SCE's Wildfire Mitigation Plan,<sup>1</sup> enhanced overhead inspections of transmission and distribution structures and equipment inform vegetation management and system hardening activities such as covered conductors and undergrounding.

SCE has recommended at the California Public Utilities Commission (CPUC) that the information from such infrastructure vulnerability assessments can inform the development of vulnerable and disadvantaged communities' (DACs') adaptation plans. However, many sectors need to come together for integrated community adaptation planning. Indeed, SCE believes that local governments, working with State agencies and the Governor's Office of Planning and Research, should lead the convening and organizing of stakeholders to contribute to community-

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<sup>1</sup> For more information, please visit <https://newsroom.edison.com/releases/southern-california-edison-files-2019-wildfire-mitigation-plan>.

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scale adaptation planning processes, spanning multiple sectors, including electric, water, transportation, and other key infrastructure sectors to develop a holistic approach to communities' adaptation planning. Solutions will likely need to be tailored to each community's needs and take advantage of each community's unique assets.

At the Workshop, much of the discussion focused on near-term investments to enable resilient emergency response and preparedness. While such efforts are clearly part of the solution, long-term planning must also be taken into consideration. For example, climate resilience assessments are needed to evaluate how forecasted climate change will impact utility infrastructure, generation planning, and grid operations in the long-term.

SCE thanks the CEC for consideration of the above comments and looks forward to its continued partnership with stakeholders in the development of the 2019 IEPR. Please do not hesitate to contact me at (916) 441-3979 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/

Catherine Hackney