

## Stakeholder Comments Template

Submitted by	Entity	Date Submitted
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Please use this template to provide your written comments on the 2019 Draft TMCR Report posted on May 15 and the presentation discussed during the May 29, 2019 stakeholder meeting.

Submit comments to [case.admin@sce.com](mailto:case.admin@sce.com)

**Comments are due June 26, 2019 by 5:00pm**

The 2019 Draft TMCR Report and the presentation discussed during the May 29, 2019 stakeholder meeting can be found on SCE’s website at the following link:

<https://www.sce.com/regulatory/open-access-information?from=%20/aboutsce/regulatory/openaccess/default.htm>

Please use this template to provide your written comments on the 2019 Draft TMCR Report topics listed below and any additional comments you wish to provide.

On behalf of the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (the “Six Cities”), provided below are comments on several topics relating to the 2019 Draft Transmission Maintenance and Compliance Review (“TMCR”) report and the TMCR process generally. While the Six Cities acknowledge SCE’s effort to provide enhanced transparency to stakeholders regarding its longer-term asset management activities via the TMCR process, there are certain areas where improvements appear to be needed to better achieve this objective. The Six Cities anticipate that the implementation of the TMCR process

will evolve in future years as SCE and its stakeholders gain more experience and familiarity with SCE's asset management activities and how they are reported.

First, the Six Cities observe that the initial draft of the TMCR Report provides information only at a very high level of generality. Many of the projected annual costs are shown aggregated into certain categories (*see, e.g.*, the costs for the Transmission Line Remediation program on page 10), but there is no breakdown of or description for how the various estimates were derived apart from the listing of "PINs" for projects in Appendix B. Nor is there significant detail regarding how SCE is organizing or prioritizing projects within the identified categories. If there is more granular data regarding specific projects and their costs, that information would enhance the transparency of SCE's projections. As an example, SCE reports aggregated forecast costs by year on Substation Infrastructure Replacement. (*See* TMCR Report at 15 and App. B.) Providing cost information for the two listed PINs broken down by, for example, substation location, would be informative. Further, to the extent that the aggregated projections include costs that are expected to be recovered via the Transmission Revenue Requirement and through wholesale distribution charges, those costs should be separately designated.

Second, the projected costs for various projects lack context. Having the Year 1 and Year 2 information presented in conjunction with Years 3-5 would allow for a more complete understanding of SCE's implementation of asset management projects over the entire period. Given that the Years 1-2 data is presumably available to stakeholders via the annual Formula Rate update process, it not clear what purpose excluding this information from the TMCR Report accomplishes.

Third, for categories in which no expenditures are expected during the relevant years, such as the Transmission Deteriorated Pole Replacement project (for example), it would be useful to understand why there are no such expenditures projected and the variables that might cause this to change.

Relatedly, it is almost incomprehensible that the Draft TMCR Report includes no information relating to projects that may be needed for purposes of expected wildfire-related equipment repair or risk mitigation for the Years 3-5 period. The Six Cities recommend that SCE address this issue, either by providing such projections as are available or documenting that it has not identified and/or is not in a position to report expected asset management activities related to either wildfire-related repairs or future hardening activities (together with the corresponding reason).

Finally, allowing stakeholders to submit reasonable information requests to SCE would improve the transparency of the TMCR process. Given the newness of this process, the Six Cities did not identify a need to submit information requests in this cycle, but this may change in future cycles. Further, the Six Cities understand that information was made available in response to data requests by the CPUC. Although the Six Cities acknowledge the CPUC's unique

role as SCE's regulator, to the extent that additional data is made available to certain parties, SCE should consider whether such information may be provided to all participants. Parties could work collaboratively on resolving confidentiality concerns if necessary.