

R.20-07-013, Phase 4, Workshop #1: Pre-Workshop Planning Questions

October 9, 2024

Definition of Scoped Work

Description of the Issue:

The Commission has previously explored the topic of scoped work in the context of the Risk Spend Accountability Reports (RSAR) as a way of gaining insight into how the utility plans to reduce risk at a granular level and how that plan is then implemented.¹ At present, the RDF does not have a specific definition of scoped work, sometimes known as a project.² The RDF requires utilities to report data at the program level, which is defined as a Commission-jurisdictional effort within Electric Operations or Gas Operations consisting of projects, activities, and/or functions with a defined scope that is intended to meet a specific objective.³ Additionally, the utilities must breakdown program level information across risk tranches, which was clearly defined in Phase 3.⁴

In the context of the Risk Spend Accountability Report (RSAR), the Commission has previously decided to focus on program level reporting in lieu of project level information.⁵ Since utility risk assessments have progressed significantly in the past five years, the Commission should now review the concept and definition of scoped work. In tandem with its Phase 3 proposal for data templates, Cal Advocates provided a definition of a project as a set of tasks with a defined timeline, for which there are a specific set of goals, and which include scoping, estimating, planning, scheduling, tracking, unit cost, budget, and assessment. During Phase 3, there was disagreement among parties regarding the need to define project in the context of the RDF. The Commission decided that robust discussion during a workshop would be needed to develop a definition of project that addresses the concerns of Staff, intervenors, and the utilities.⁶

Planning Questions:

1. What guidelines are needed to ensure a utility properly defines the scale and granularity of scoped work?
2. What should be the stages of a lifecycle of a scoped work? Should the lifecycle include the following stages (explain your answer for each stage):
 - a. scoping,
 - b. designing,
 - c. permitting,
 - d. construction/implementation,
 - e. post-construction
3. Should scoped work be forecastable?

¹ D.19-04-020 at 34.

² In some contexts scoped work is also called a project. However, the term “project” can have a specific legal meaning which may or may not be appropriate in this context.

³ D.22-12-027, Appendix A, at A-17-A-19, Row 28. See also D.19-04-020 at 35.

⁴ D.24-05-064 at 26-27 and 119.

⁵ D.19-04-020 at 34.

⁶ D.24-05-064 at 110.

- a. If so, what aspects of scoped work should be forecastable? How far into the future should scoped work be forecastable?
 - b. If not, why not?
4. Should scoped work be auditable?
 - a. If so, what aspects of scoped work should be auditable? Should it include (explain your answer for each):
 - i. Timing
 - ii. Cost
 - iii. Risk reduction
 - b. If not, why not?
5. What is the appropriate level of granularity for scoped work given the goals of transparency required by the RDF? How should the level of granularity be determined? Please explain.
 - a. Should the Commission provide guidance to ensure that a scoped work is not overly aggregated? If so, how should that guidance be written? If not, why not?
 - b. Should the Commission provide guidance to ensure that a scoped work is not overly granular? If so, how should that guidance be written? If not, why not?
6. Should scoped work for reducing risk associated with the electric grid or natural gas pipelines only remove or mitigate a group of assets that are contiguous with each other? In other words, should scoped work only include electric lines, poles, and transformers or pipelines, compressors and feeders etc. that are all connected to each other?
7. Some risk assessments are conducted on single assets, such as dams, despite the fact that they are complex, highly engineered structures with multiple systems. Within that context, should scoped work for reducing risk be associated with only one asset?
8. Should scoped work be identified as reducing risk (either LoRE and/or one or more of the three Attributes of CoRE) on a specific asset or system in the utility's territory?
 - a. If so, why? How should that mapping occur?
 - b. If not, why not? What are the challenges to mapping a scoped work to a specific asset or system?
9. Should the concept of scoped work be integrated into the Commission's reporting requirements related to risk mitigations?
 - a. If so, which reporting requirements? Should this include:
 - i. RAMP and GRC Data Templates
 - ii. Risk Mitigation Accountability Reports
 - iii. Risk Spend Accountability Reports
 - iv. System Hardening Accountability Reports
 - b. If not, why not?

10. If there is a better alternative to the term “scoped work”, such as Risk Reporting Unit, should the Commission consider adopting the alternative term to represent the disaggregation of a mitigation program?