

Southern California Edison

R.18-10-007 – SB 901

DATA REQUEST SET T U R N - S C E - 0 0 1

To: TURN

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Received Date: 11/18/2018

Response Date: 9/13/2019

Question 01 Supplemental:

Using the table format shown below, please identify the number of miles of overhead conductor, broken out separately for

transmission and distribution facilities, that the utility operates:

- a. Outside of High Fire Risk Areas (HFRA).
- b. In HFRA.
- c. In HFRA the CPUC has categorized as Tier 3.
- d. In HFRA the CPUC has categorized as Tier 2

	Non-HFRA	HFRA-Tier 3	HFRA-Tier 2	HFRA-Total
Transmission				
Distribution				

Response to Question 01 Supplemental:

SCE submits this amended data request response to account for the following two changes:

As described in SCE’s August 30, 2019 2021 GRC Application (A.19-08-013), traditionally, SCE has defined its HFRA to include both Commission-designed high-threat “Tier” 2 and 3 areas (collectively known as High Fire Threat Districts (HFTD)) as well as non-Commission-designated areas that SCE has historically considered to be at elevated risk of wildfires (Non-Tiered Areas). As required by D.19-05-038, SCE has completed an internal rigorous assessment of its Non-Tiered Areas that determined which subsections of those areas should be retained as HFRA and which should be excluded from HFRA on a going-forward basis. SCE documented those efforts in detail both in its July 5, 2019 Advice Letter 4030-E as well as its August 19, 2019 Petition for Modification (PFM) of D.17-12-024, the latter of which formally requests the Commission make changes to its official HFTD fire maps to include the portion of Non-Tiered Areas SCE proposes to retain as HFRA. SCE’s final analysis concluded that a 99% exclusion rate (i.e., a 1% retention rate) was appropriate, and this latter figure is the basis of the pending PFM of D.17-12-024.

As a separate issue, but one that has the same directional effect, the data request response counted the number of HFRA circuit miles using a “roll-up” methodology, which was based on our historical operational practices. SCE has subsequently developed a new HFRA circuit mile calculation methodology known as the “spatial clip” method, which more precisely counts the exact number of circuit miles that physically reside in each HFRA tier from a geospatial perspective.

Changes to the original data request response are shown in red font and strikethrough.

The table below provides a breakdown of Overhead (OH) Distribution and Transmission OH circuit miles by High Fire Risk Area (HFRA) category. This data is for OH primary lines only, current as of ~~September 2019~~ ~~November 2018~~. This data may change in the future as part of SCE’s ongoing review of its asset information and/or system changes (e.g., adding new circuits). Note that SCE’s estimate of total Distribution OH primary circuit miles in HFRA (~~12,978~~ 9,828 circuit miles) is approximately ~~3,200 circuit miles greater than~~ 3,150 circuit miles less than the ~~initial~~ estimate provided in support of its ~~second amended testimony (Dec. 2018)~~ in the Grid Safety and Resiliency Program (GSRP) filing (A.18-09-002). ~~SCE is in the process of updating its supporting testimony and workpapers in A.18-09-002 to account for this information.~~

Distribution¹ and Transmission Primary OH Circuit Miles

	Column A	Column B	Column C	Column D	Column E	Column F	Column G	B + C + D + E + F + G
	Non HFRA (Circuit Miles)	Non-CPUC HFRA (Circuit Miles)	Zone 1 (Circuit Miles)	200’ Buffer Zone for Tier 2 (Circuit Miles)	HFRA-Tier 2 (Circuit Miles)	200’ Buffer Zone for Tier 3 (Circuit Miles)	HFRA-Tier 3 (Circuit Miles)	HFRA-Total (Circuit Miles)
Transmission	6,458 8,468	836 57	0	98 115	1,976 1,785	23 6	3,430 2,389	6,363 4,352
Distribution	26,256 29,406	2,980 176	3 2	365	3,744 3,512	33	5,853 5,740	12,978 9,828
Total	32,714 37,874	3,816 233	3 2	463 480	5,720 5,297	56 39	9,283 8,129	49,341 14,180

HFRA Category Descriptions:

Non HFRA: Areas that are outside of CPUC Tier 2 and Tier 3, outside of the 200’ buffer, and outside of the Non-CPUC HFRA’s.

¹ SCE’s estimate of total Distribution OH primary circuit miles in HFRA (shown as ~~12,978~~ 9,828 circuit miles) is ~~approximately 3,200 miles circuit greater than~~ approximately 3,150 circuit miles less than the ~~initial~~ estimate provided in its ~~second amended testimony~~ in support of its Grid Safety and Resiliency Program (GSRP) filing (A.18-09-002). ~~SCE is in the process of updating its supporting testimony and workpapers in A.18-09-002 to account for this information.~~

Non-CPUC HFRA: These areas were previously designated by SCE as HFRA but are not included in the current CPUC High Fire Threat Maps. SCE ~~is evaluating~~ has completed its evaluation of these areas ~~to determine whether they should still be considered~~ and has recommended to retain approximately 1% of those areas as HFRA, ~~but is continuing to maintain this designation for now out of an abundance of caution.~~ See SCE's August 19, 2019 Petition for Modification of Decision 17-12-024 pending in R.15-05-006.

Zone 1: These areas consist of the Tier 1 High Hazard Zone (HHZ) on the United States Forest Service (USFS) - CAL FIRE joint map of Tree Mortality HHZs.

200' Buffer Zone for Tier 2: SCE has created a 200' buffer zone along the borders of CPUC Tier 2 areas. This buffer abuts CPUC Tier 2 but is not included when Tier 2 abuts Tier 3.

HFRA-Tier 2: These areas consist of the CPUC-defined Tier 2 areas.

200' Buffer Zone for Tier 3: SCE has created a 200' buffer zone along the borders of CPUC Tier 3 areas. This buffer abuts CPUC Tier 3 but is not included when Tier 3 abuts Tier 2.

HFRA-Tier 3: These areas consist of the CPUC-defined Tier 3 areas.