

*Southern California Edison*

***WSD-011 – Resolution implementing the requirements of Public Utilities Code Sections 8389(d)(1), (2) and (4) related to catastrophic wildfire caused by electrical corporations subject to the Commission’s regulatory authority***

**DATA REQUEST SET TURN - SCE - 009**

**To: TURN**

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**Job Title: Predictive Analytics/Data Science, Sr Advisor**

**Received Date: 3/18/2021**

**Response Date: 3/26/2021**

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**Question 004 Supplemental:**

Regarding the risk curve relied on in SCE’s 2021 GRC: a. Does it “show that risk is not uniform and some segments exhibit significantly more wildfire risk than others”? b. Does it show “the risk associated with each circuit may not be uniform along its length”?

**Response to Question 004 Supplemental:**

SCE objects to this question on the following grounds: (1) the question seeks general rate case information that is outside the scope of this proceeding under Public Utilities Code Sections 8386 & 8386.4(b)(1); (2) the question seeks information not relevant to evaluation of SCE’s Wildfire Mitigation Plan; (3) the question seeks information not reasonably likely to lead to WMP comments that would be appropriate under Public Utilities Code Section 8386(d); and (4) there is no support for this question under Resolution WSD-001 or the “Wildfire Safety Division Guidance on Resolution WSD-001 and Data Request Best Practices” (January 29, 2021). Notwithstanding this objection, SCE responds as follows:

- a) By “uniform,” SCE interprets that as “uniformly distributed,” which means *risk=c* where c is a constant value.

Yes, risk is not uniform and some segments exhibit higher wildfire risk than others. Because the risk can vary among different segments across different circuits, especially if circuits traverse HFTD tiers and the circuit segments are exposed to different probabilities of ignition by contact from objects, or varying topography and vegetation that can influence fire propagation and consequence.

If the risk is uniform among all segments on all circuits, then the risk curve would be closer to a straight line.

- b) By “uniform,” SCE interprets that as “uniformly distributed,” which means *risk=c* where c is a constant value.

Yes, the risk associated with each circuit may not be uniform along its length. A typical circuit has many connected segments and risk can vary among them, especially if that circuit traverses HFTD tiers and is exposed to different probabilities of ignition by contact from objects, or varying topography and vegetation that can influence fire propagation and

consequence.

If the risk is uniform among all segments on all circuits, then the risk curve would be closer to a straight line.