

*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 W S D - S C E - 0 0 3**

**To: WSD**

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**Job Title: Consultant**

**Received Date: 3/4/2021**

**Response Date: 3/9/2021**

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**Question 002:**

SCE's reported cycle spend has conflicted across submissions, and WSD requires SCE to remedy this issue as detailed below. Provided that the WSD has attempted to obtain this information for several weeks, if SCE fails to provide the WSD with accurate and consistent information, or explanations for any discrepancies, the WSD will factor this into its review of SCE's 2021 WMP and pursue further action as necessary.

Context - The following outlines the timeline of data collection efforts for SCE spend data from the most recent reporting in 2020 (WMP revision 02) to the most recent reporting in 2021.

- In its 2020 WMP submission (second revision), SCE reported a total 2020-22 planned cycle spend of 4.512B, calculated by summing all rows titled "2020-2022 plan total" in column C of tables 21-30 from the 2020 WMP.
- In its 2021 WMP submission on February 5th, SCE reported a total 2020-2022 cycle planned spend of \$6.751B, calculated by summing columns (U+V+Y+Z+AC+AD) as reported in table 12 "SCE Tables 1-12.xlsx"
- In the first utility call on 2/10/2021, SCE explained that the \$6.751B reported spend in the 2021 WMP included all initiative spend, both within and outside of "high fire risk areas" or "HFRA" (referred to as 2021 cycle reported). This reporting method differed from the \$4.512B spend SCE reported in 2020, which SCE only included spend in HFRA (referred to as 2020 cycle reported).
- To obtain comparable data across submissions, the WSD submitted a follow-on data request on 2/18/2021, requesting SCE to split the 2021 cycle reported \$6.751B into HFTD and non-HFTD, and provide the non-HFTD portion of the 2020 cycle reported.
- o On 2/23/2021 SCE responded to the data request by providing "WSD-SCE-001 Q1 Data request SCE 2021 Table 12\_v02 20210223.xlsx", which split 2021 cycle reported into HFTD and non-HFTD in columns AS - BP. However, SCE did not provide 2020 cycle reported in HFTD or non-HFTD, as required in columns U-AR
- Summing columns (AU+AV+BC+BD+BK+BL) in "WSD-SCE-001 Q1 Data request SCE 2021 Table 12\_v02 20210223.xlsx" SCE's 2021 cycle reported spend was \$6.753B, which is slightly inconsistent with the \$6.751B reported

**Issue**

- On 3/1/2021, after still not receiving data requested on 2/18/2021, the WSD found what it believes to be SCE's 2020 cycle reported in HFTD and non-HFTD on SCE's website in a file titled "002\_Data request SCE 2021 Table 12\_20210223.xlsx"
- o In "002\_Data request SCE 2021 Table 12\_20210223.xlsx" SCE provided a territory-wide (HFTD

and non-HFTD) 2020 cycle reported of \$4.473B, which was calculated by summing columns (W+X+AE+AF+AM+AN)

- This is less than the HFRA-only 2020 cycle reported of \$4.512B, as reported in SCE's 2020 WMP (second revision), despite including spend across SCE's entire territory
  - o In "002\_Data request SCE 2021 Table 12\_20210223.xlsx" SCE provided an HFTD 2020 cycle reported of \$3.824B, which was calculated by summing columns (AL+AK+AD+AC+V+U)
- This is \$0.688B less in WMP cycle spend than was reported in SCE's 2020 WMP for HFRA spend (4.512B). However, SCE stated during 2/17 utility content call that HFTD was equivalent to HFRA
- Additionally, on the 2/26/2021 utility call, SCE stated its reported cycle spend for Category C – “Grid design and system hardening” had increased by \$100M from its 2020 cycle reported to 2021 cycle reported. However, WSD finds a \$700M decrease in planned cycle spend from 2020 cycle reported to 2021 cycle reported. 2020 cycle reported spend in Grid Design and system hardening was calculated by summing all rows titled “2020-2022 plan total” in column C of table 23 from the 2020 WMP. 2021 cycle reported spend in Grid design and system hardening was calculated by summing columns (U+V+Y+Z+AC+AD) for all rows labeled “Grid Design & System Hardening” in column C as reported in table 12 " SCE Tables 1-12.xlsx"

#### Remedy

- Below is WSD's understanding of SCE's total cycle spend and Grid design and system hardening cycle spend prior to 3/1. The WSD requests SCE to confirm whether these values are correct. If these values are incorrect, indicate which submission of 2020 reported spend the WSD should use (by providing the appropriate file name) and how to calculate the correct values (with reference to appropriate rows/columns in the identified file), as requested in the table below.

Provided that the WSD has attempted to obtain this information for several weeks, SCE is requested to provide the above information by 3/9/2021. If SCE fails to provide the WSD with accurate and consistent information, or explanations for any discrepancies, the WSD will factor this into its review of SCE's 2021 WMP and pursue further action as necessary.

Region of SCE territory	Total cycle spend reported in 2020 WMP (\$B)	Total cycle spend reported in 2021 WMP (\$B)	% change from 2020 reported to 2021
Territory-wide	6.431	6.754	+5%
HFTD-only	4.511	4.830	+7%

Region of SCE territory	Grid hardening cycle spend reported in 2020 WMP (\$B)	Grid hardening cycle spend reported in 2021 WMP (\$B)	% change from 2020 reported to 2021
Territory-wide	4.803	4.095	-15%
HFTD-only	3.162	2.455	-22%

#### Response to Question 002:

For SCE's response to this data request, please see Excel file entitled “WSD-SCE-003-002\_20210309.xlsx.” The following tabs can be found within file “WSD-SCE-003-002\_20210309.xlsx:”

- *Summary* – States the total cycle spend reported in the 2020 WMP and the 2021 WMP by region of SCE territory and by WMP activities and non-WMP programs
- *WMP Forecast Comparison* – Compares the forecast between the 2020 WMP (revision 2) and the 2021 WMP and provides variance explanations at the WMP Activity level
- *WMP Program Reconciliation* – Reconciles the WMP Activities in the 2020 WMP with the 2021 WMP
- *Grid Hardening Reconciliation* – Reconciles the WMP Activities related to Grid Design and System Hardening in the 2020 WMP with the 2021 WMP (similar to *WMP Program Reconciliation* tab, but focused on Grid Design and System Hardening)
- *DATA\_Tables 21-30 Rev2* – Consolidates tables 21-30 from the 2020 WMP (revision 2) into a single tab
- *Tables 21-30* – These tabs are from the 2020 WMP (revision 2) and are for reference

Notes and formulas appear throughout the file for your reference.