

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 4

To: WSD

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Response Date: 3/17/2021

Question 012:

In addition to the initiative outlined in the question above, SCE did not provide RSE values for many initiatives that have a direct impact on the probability and consequence of ignition or de-energization. For each initiative in Table Q12:

12(a). Provide RSE values.

12(b). For each initiative that (a) cannot be completed, identify the missing variables necessary to complete the RSE calculation, detail the plan to obtain the necessary variables, and the timeline for completion.

Response to Question 012:

- (a) SCE did not calculate RSEs for the activities and programs in the table below. Please see response to the previous question.
- (b) The initiatives in Table Q12 either do not have a direct impact on probability and consequence of ignition or de-energization or are not SCE WMP activities, and SCE provided an explanation, in the respective WMP section, as to why an RSE was not calculated. SCE has added an extra column to the table, including page number reference and the description given in SCE’s WMP filing. For the reasons cited below, there is no plan to calculate RSE’s for these initiatives.

Initiative	WMP Section	SCE’s WMP Reference
Fault indicators for detecting faults on electric lines and equipment	7.3.2.3	This is not a SCE WMP activity. Pg. 196 – “An RSE was not developed and no alternatives were identified for this initiative, because fault indicators are installed and used as part of SCE’s standard grid operations and are not specifically deployed for wildfire mitigation purposes.”
Fire Potential Index (FPI) (SA-2)	7.3.2.4.1	This activity does not directly mitigate wildfire or PSPS risk. Pg. 197 – “SCE did not develop an RSE for this enabling activity as it does not directly reduce wildfire or PSPS risk or consequence. Rather, FPI improvement enables more effective execution of other wildfire mitigation activities,

		and the RSE calculations for those activities in the future will reflect the benefits of FPI improvement.”
Fuel Sampling (SA-5)	7.3.2.4.2	<p>This activity does not directly mitigate wildfire or PSPS risk.</p> <p>Pg. 199 – “SCE did not develop an RSE for this enabling activity as it does not directly reduce wildfire or PSPS risk or consequence. Rather, this activity enables more effective execution of other wildfire mitigation activities, and the RSE calculations for those activities in the future will reflect these benefits.”</p>
Remote Sensing (SA-7)	7.3.2.4.3	<p>This activity does not directly mitigate wildfire or PSPS risk.</p> <p>Pg. 200 – “SCE develop an RSE for this enabling activity as it does not directly reduce wildfire or PSPS risk or consequence. Rather, this activity enables more effective execution of other wildfire mitigation activities, and the RSE calculations for those activities in the future will reflect these benefits.”</p>
Fire Science Enhancements (SA-8)	7.3.2.4.4	<p>This activity does not directly mitigate wildfire or PSPS risk.</p> <p>Pg. 202 – “SCE did not develop an estimate the RSE for this enabling activity as it does not directly reduce wildfire or PSPS risk or consequence. Rather, this activity enables more effective execution of other wildfire mitigation activities, and the RSE calculations for those activities in the future will reflect these benefits.”</p>
Weather and Fuels Modeling (SA-3)	7.3.2.6.1	<p>This activity does not directly mitigate wildfire or PSPS risk.</p> <p>Pg. 204 – “SCE did not develop an RSE for this enabling activity as it does not directly reduce wildfire or PSPS risk or consequence. Rather, this activity enables more effective execution of other wildfire mitigation activities, and the RSE calculations for those activities in the future will reflect these benefits.”</p>
Fire Spread Modeling (SA-4)	7.3.2.6.2	<p>This activity does not directly mitigate wildfire or PSPS risk.</p> <p>Pg. 206 – “SCE develop an RSE for this enabling activity as it does not directly reduce wildfire or PSPS risk or consequence. Rather, this activity enables more effective execution of other wildfire mitigation activities, and the RSE calculations for those activities in the future will reflect these benefits.”</p>
Personnel monitoring areas of electric lines and equipment in	7.3.2.5	This is not a SCE WMP activity.

elevated fire risk conditions		Pg. 203 – “As line patrols are a necessary component of implementing PSPS events, a separate RSE for just this activity was not calculated.”
Remote Controlled Automatic Reclosers Settings Update (SH-5)	7.3.3.9	<p>There is no work scope identified for 2021 and beyond with this activity and hence no RSE was calculated.</p> <p>Pg. 219 – “SCE has completed the RAR and Remote Controlled Switch (RCS) scope identified in GSRP, the 2021 GRC filing, and last year’s 2020-2022 WMP. While no additional scope is currently identified for 2021, SCE will continue to assess locations that could benefit from these devices in 2021, most notably as part of the ongoing review of circuits impacted by PSPS, outlined in SH-7.”</p>
Intrusive pole inspections	7.3.4.6	<p>This is not a SCE WMP activity.</p> <p>Pg. 237 – “Though SCE does not calculate RSEs for compliance programs which have to be undertaken regardless of RSEs, SCE supports risk informed evaluation of compliance requirements in collaboration with the Commission. This traditional program is not driven by wildfire risk reduction and has consistently been approved in SCE GRCs.”</p>
LiDAR inspections of distribution electric lines and equipment	7.3.4.7	<p>This is not a SCE WMP activity.</p> <p>Pg. 238 – “SCE does not have a separate LiDAR program for inspecting distribution lines and equipment. SCE uses LiDAR as part of its inspection programs described in Section 7.3.4.9.1”</p>
LiDAR inspections of transmission electric lines and equipment	7.3.4.8	<p>This is not a SCE WMP activity.</p> <p>Pg. 238 – “SCE does not have a separate LiDAR program for inspecting transmission lines and equipment. SCE uses LiDAR as part of its inspection programs described in Section 7.3.4.10.1”</p>
Patrol inspections of distribution electric lines and equipment	7.3.4.11	<p>This is not a SCE WMP activity.</p> <p>Pg. 248 – “SCE performs patrols of SCE’s overhead distribution electric system in compliance with GO 165. GO 165 requires SCE to perform an annual patrol inspection of all overhead distribution electric assets that are located in SCE’s HFRA. Though SCE does not calculate RSEs for compliance programs which have to be undertaken regardless of RSEs, SCE supports risk informed evaluation</p>

		of compliance requirements in collaboration with the Commission.”
Patrol inspections of transmission electric lines and equipment	7.3.4.12	<p>This is not a SCE WMP activity.</p> <p>Pg. 249 – “SCE performs patrol inspections of SCE’s overhead transmission electric system in compliance with GO 165, NERC, WECC and CAISO rules and regulations. Though SCE does not calculate RSEs for compliance programs which have to be undertaken regardless of RSEs, SCE supports risk informed evaluation of compliance requirements in collaboration with the Commission.”</p>
Detailed inspections of vegetation around transmission electric lines and equipment	7.3.5.3	<p>This activity does not directly mitigate wildfire or PSPS risk, but instead informs Vegetation management.</p> <p>Pg. 257 – “This activity does not have its own RSE because by itself, it does not directly mitigate wildfire or PSPS risk. Rather, it informs the mitigation, Vegetation management to achieve clearances around electric lines and equipment (Section 7.3.5.20), that directly mitigates wildfire and PSPS risk.”</p>
Emergency response vegetation management due to red flag warning or other urgent conditions	7.3.5.4	<p>The RSE for this activity is incorporated into Section 7.3.4.9 (High Fire Risk-Informed Inspections and Remediations)</p> <p>Pg. 259 – “Please see Section 7.3.4.9 for the RSE information on HFRI”.</p>
Improvement of inspections (vegetation)	7.3.5.6	<p>This activity does not directly mitigate wildfire or PSPS risk, but instead informs Vegetation management.</p> <p>Pg. 264 – “this activity enables more effective execution of other wildfire mitigation activities, and the RSE calculations for those activities in the future will reflect these benefits.”</p>
LiDAR inspections of vegetation around distribution electric lines and equipment	7.3.5.7	<p>This activity does not directly mitigate wildfire or PSPS risk, but instead informs Vegetation management.</p> <p>Pg. 265 – “This activity does not have its own RSE because by itself, it does not directly mitigate wildfire or PSPS risk. Rather, it informs the mitigation, Vegetation management to achieve clearances around electric lines and equipment (Section 7.3.5.20), that directly mitigates wildfire and PSPS risk.”</p>
LiDAR inspections of vegetation around transmission electric lines and equipment	7.3.5.8	<p>This activity does not directly mitigate wildfire or PSPS risk, but instead informs Vegetation management.</p> <p>Pg. 266 – “This activity does not have its own RSE because by itself, it does not directly mitigate wildfire or PSPS risk.</p>

		Rather, it informs the mitigation, Vegetation management to achieve clearances around electric lines and equipment (Section 7.3.5.20), that directly mitigates wildfire and PSPS risk.”
Patrol inspections of vegetation around distribution electric lines and equipment	7.3.5.11	<p>This activity does not directly mitigate wildfire or PSPS risk, but instead informs Vegetation management.</p> <p>Pg. 268 – “This activity does not have its own RSE because by itself, it does not directly mitigate wildfire or PSPS risk. Rather, it informs the mitigation, Vegetation management to achieve clearances around electric lines and equipment (Section 7.3.5.20), that directly mitigates wildfire and PSPS risk.”</p>
Patrol inspections of vegetation around transmission electric lines and equipment	7.3.5.12	<p>This activity does not directly mitigate wildfire or PSPS risk, but instead informs Vegetation management.</p> <p>See 7.3.5.11 above for WMP referenced citation.</p>