

Southern California Edison
2022-WMPs – 2022 Wildfire Mitigation Plan Updates

DATA REQUEST SET O E I S - S C E - 2 2 - 0 0 2

To: Energy Safety
Prepared by: Ryan Stevenson
Job Title: Senior Advisor
Received Date: 3/15/2022

Response Date: 3/18/2022

Question 03:

Table 12 – Mitigation Initiative Financials:

- a. SCE's reported, territory-wide, projected cycle spend for 2020 is currently reported as \$5.9B (\$5,945,266,714.79) and is inconsistent with historical data on file. The latest historical data on file reports the following amounts for the same period: \$4.5B (includes initiative 7.1D) and \$4.3B (not including initiative 7.1D). See Attachments 1 and 2 for further information.
 - i. Please clarify what SCE's reported cycle spend was for the 2020 reporting year. Additionally, provide the tables, sources, and methods used to produce this figure.
 - ii. Please specify between territory wide spend and High Threat Fire District (HTFD) spending (CAPEX & OPEX)

Response to Question 03:

- i) The territory-wide projected cycle spend in 2020 for the 2020-2022 WMP period was \$5.9B. In 2021, SCE responded to a Wildfire Safety Division 2021 WMP DR (DR set WSD-SCE-003, Question 002) that provided reconciliation of the various categories of spend from the 2020-2022 WMP and the 2021 WMP Update. These DR response files (pdf and Excel) are attached. It is important to note that the 2020-2022 WMP Guidelines did not require reporting costs territory wide; however, the 2021 Update Guidelines did. As such, in the Excel file entitled, "002-WSD-SCE-003_20210309.xlsx." that accompanied the DR response, SCE added \$2.1B of non-WMP program that was excluded from Tables 21-30 to arrive at the \$5.9B. Please see the Summary tab in this Excel file that shows the total cycle spend for the 2020-2022 WMP and seen in the table below.

	Region of SCE territory	Total cycle spend reported in 2020 WMP (\$B)
SCE WMP activities and non-WMP programs	Territory-wide	5.945
SCE WMP activities and non-WMP programs	HFTD-only	4.490
SCE WMP activities	HFTD-only	3.823

SCE is also attaching a file that provides the backup for the \$2.1B. See Excel file entitled, “2020 WMP Non-WMP Activities_Op Plan forecast.xlsx.”

ii) Please see the Excel file entitled, “002-WSD-SCE-003_20210309.xlsx” that includes the requested 2020-2022 WMP cost categories.

Please also note that SCE does not consider several WMP “initiatives” as wildfire initiatives since the driver of these initiatives is not to reduce wildfire risk. Also, SCE’s wildfire initiatives (or WMP Activities) are primarily executed in SCE’s HFRA. Given this information, presenting territory-wide costs for WMP activities and non-WMP programs can be misleading. SCE recommends OEIS present the cost forecasts for just WMP activities that occur in HFRA. In 2020, this forecast was \$3.8B over the 2020-2022 WMP period.