

*Southern California Edison*  
*R.18-10-007 – SB 901*

**DATA REQUEST SET A b r a m s - S C E - 0 0 1**

**To: Abrams**  
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**Job Title: Senior Advisor**  
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**Response Date: 3/7/2019**

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**Question 05:** Please, provide a list of the top 100 most at-risk components or parts related to electric transmission and provide ranking and relative risk ratio for each of the following categories (based on most recent data available):

- a. likely/relative contribution to wildfire ignitions
- b. likelihood of being an ignition source
- c. likely/relative contribution to the propagation/spread of wildfires

**Response to Question 05:**

SCE objects to the question as it is overly broad and unduly burdensome. Notwithstanding this objection, SCE responds as follows.

As described in SCE's 2019 WMP (See Section 3), over the 2015-2017 time period, SCE experienced 302 reportable ignition events associated with electrical infrastructure within its service territory. 92 percent of these ignitions occurred at distribution level voltages (33 kV and below), while eight percent occurred at subtransmission and transmission level voltages (55 kV and above). When analyzed based on presence in HFRA, 50 percent of these ignitions occurred in HFRA, and 50 percent occurred outside of HFRA. Based on both frequency and consequence considerations, four tranches of SCE assets for wildfire risk analysis are illustrated in Figure 3-1. SCE identified distribution equipment within SCE's HFRA as the specific tranche of assets that poses the most significant wildfire risk. SCE considers the tranche of HFRA distribution assets, representing approximately 44 percent of all ignition events associated with SCE during the studied period, to have the highest frequency and the highest potential consequence of ignitions of the four tranches. As such, SCE's wildfire risk analyses performed to date have prioritized evaluation and mitigation of wildfire risk within this tranche, i.e., distribution facilities located in HFRA. Further, as shown in Table 3-3, 6 percent of ignitions in SCE's HFRA (19 ignition events over three years) were associated with SCE's subtransmission/transmission facilities during years 2015-2017. SCE is currently in the process of analyzing 2018 fire ignition data. In addition to incorporating CPUC-reportable 2018 historical ignition data (preliminary data indicates there were 46 reported ignitions across SCE's HFRA) into its analysis to identify trends and changes among ignition drivers, SCE will incorporate additional engineering and operational subject matter expertise into its risk analysis performed in 2019, and data collected through inspections of equipment in HFRA, including distribution, transmission, and substation infrastructure. Additionally, in its 2019 risk analysis (to inform the 2020 WMP), SCE will include an analysis of equipment that were not associated with reportable historical ignitions in HFRA, but that could potentially lead to an ignition, such as lightning arresters, poles, protective relays, switches, etc. SCE is also currently developing a fire consequence model at a circuit segment level, which will further inform the prioritization for various mitigations based on wildfire risk exposure.