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 T U R N - S C E - 0 0 2

To: TURN
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Received Date: 2/19/2021

Response Date: 2/24/2021

Question 001:
Re SCE Excel data attachment, Table 12, initiative 7.3.3.3.1 (Covered conductor installation):

a. The table specifies that if an alternative unit is used, "still required to report line miles," but SCE did not report line miles for this initiative. If possible, please provide the number in line miles actual and projected for each year 2020-2022.

b. Please explain how SCE converts from "# of miles of covered conductor installs" to "line miles." Provide a sample calculation. Provide an estimate of the standard of deviation if there is variance.

Response to Question 001:

a. SCE reported the number of miles of covered conductor installs in circuit miles as an alternative unit because line miles are not utilized by SCE as part of the developed risk models or as a criterion for targets. Additionally, SCE has not been required to report out in line miles; therefore, our current GIS systems data inputs limit us from providing this information.

b. The WSD defines circuit miles and line miles as follows:[1]

- Circuit Miles: The total length in miles of separate circuits regardless of the number of conductors used per circuit.
- Line Miles: The number of miles of transmission and/or distribution line. Differs from circuit miles because individual circuits, such as the two circuits of a double-circuit line, are not counted separately in circuit miles but are counted as separate total miles of line.

SCE found the definitions for "Circuit Miles" and "Line Miles" to be in conflict. The definition for circuit miles specifically states, "the total length of ***separate*** circuits," while the last portion of the definition for line miles states "as the two circuits of a double-circuit line, are not counted separately in circuit miles but are counted as separate total miles of line." The former states the length is counted for each circuit (even if the circuit runs along the same path), while the latter does not count the lengths when the circuit runs along the same path.

[1] Wildfire Safety Division (November 2020). Resolution WSD-011 – Attachment 2.2: 2021 Wildfire Mitigation Plan (WMP) Guidelines Template, retrieved February 23, 2020 from https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M352/K460/352460864.pdf

Due to this conflict, SCE used its definition for circuit versus line miles:

- "Circuit Miles" are the total linear miles considering all circuits along the path of reconductor.
    - For example, if Circuit X is getting reconductored from point A to point B for 1 mile, and Circuit Y runs along the same path and will be reconductored as well, the total Circuit Miles would be equal to 2 Circuit Miles.
- "Line Miles" are the linear path of reconductor as a distance from point A to point B regardless of the number of circuits.
    - For example, if Circuit X is getting reconductored from point A to point B for 1 mile, and Circuit Y runs along the same path and will be reconductored as well, the total Line Miles would equal to 1 Line Mile.

Under SCE's definition, the process to convert the number of covered conductor installs to line miles would be overly burdensome. The process would consist of verifying all portions of reconductor at the project level to verify locations where circuits run along the same path and by mapping each asset to circuits to which the asset is connected. This process would require an extensive manual effort due to the current limitations of GIS data.