

Southern California Edison
2023-WMPs – 2023-WMPs

DATA REQUEST SET CalAdvocates-SCE-2023WMP-08

To: Cal Advocates
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Job Title: Wildfire Safety – Sr Advisor
Received Date: 4/5/2023

Response Date: 4/10/2023

Question 09:

Referring to section 7.1.4.2 Mitigation Initiative Prioritization, on p.205 of your WMP, SCE states that:

Therefore, undergrounding is preferred unless covered conductor has already been installed or specific terrain or local issues require alternatives such as covered conductor with supplementary mitigations.

Additionally, on p.216 of your WMP, SCE states that:

Areas that will be undergrounded will have interim mitigations deployed such as asset inspections (at the most frequent interval), vegetation management, and fast curve settings, that are complementary to covered conductor while the segment is waiting to be undergrounded.

- a) Does the preference for undergrounding mean that existing covered conductors in the HFRA will be replaced with underground cables in the future?
- b) If the answer to part (a) is yes, in what circumstances will SCE replace existing covered conductor with underground conductors?
- c) If the answer to part (a) is yes, please explain when and at what scale this will happen.
- d) In areas where covered conductors are already in place, will they be left in place unless there are specific reasons for implementing targeted undergrounding?
- e) Do the abovementioned interim mitigations for areas waiting to be undergrounded apply only to locations with covered conductors, or will they be applied to other types of distribution infrastructure as well?
- f) What is the timeline for transitioning from covered conductors to underground cables in targeted areas?

Response to Question 09:

- a. Does the preference for undergrounding mean that existing covered conductors in the HFRA will be replaced with underground cables in the future?*
- b) If the answer to part (a) is yes, in the future?*

As noted on p. 205, in Severe Risk Areas where the threat to lives and property is elevated, SCE prefers to underground overhead distribution lines unless: 1) the lines already have covered conductor, or 2) there are terrain or local issues, such as permitting, environmental, customer or agency approval/acceptance, that preclude SCE from undergrounding. With some exceptions, SCE does not seek to underground existing overhead covered conductor. In some limited cases, it may be prudent - due to operational or emergent risk-related reasons - to consider undergrounding spans of

lines that may previously have had covered conductor deployed. For locations with terrain or local issues, SCE would look at alternatives to undergrounding, such as covered conductor with supplementary mitigations, like REFCL, that can achieve a nearly equivalent level of mitigation effectiveness as undergrounding or mitigate as much risk as possible. It is also possible that SCE may underground existing overhead covered conductor for non-wildfire reasons, such as part of a Rule 20 project.

- b. If the answer to part (a) is yes, in what circumstances will SCE replace existing covered conductor with underground conductors?*

See the response in (a) above.

- c. If the answer to part (a) is yes, please explain when and at what scale this will happen.*

See the response in (a) above.

- d. In areas where covered conductors are already in place, will they be left in place unless there are specific reasons for implementing targeted undergrounding?*

Yes.

- e. Do the abovementioned interim mitigations for areas waiting to be undergrounded apply only to locations with covered conductors, or will they be applied to other types of distribution infrastructure as well?*

The statement on p. 216 is intended to indicate that the lines that we plan to underground are bare wires that will have interim mitigations, such as asset inspections (at the most frequent interval), vegetation management, fast curve settings, etc.

- f. What is the timeline for transitioning from covered conductors to underground cables in targeted areas?*

The vast majority of our undergrounding program is to convert bare overhead lines to undergrounding, except for rare circumstances where we would underground lines that already have covered conductor. Therefore, we do not have a timeline for transitioning from covered conductors to underground cables in targeted areas.