Southern California Edison
2023-WMPs – 2023-WMPs

DATA REQUEST SET C a l A d v o c a t e s - S C E - 2 0 2 3 W M P - 0 8

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Response Date: 4/10/2023

Question 02:
Referring to section 6.2.1.2 Integrated Wildfire Mitigation Strategy (IWMS) Risk Framework, on p.102 of your WMP, SCE states that:
SCE started using the IWMS Risk Framework to prioritize mitigation selection and scope for grid hardening activities, inspection programs, and vegetation management activities in 2022. Due to the long lead time for planning and construction for covered conductor and undergrounding, the earliest that mitigations scoped with the IWMS Risk Framework will be placed in-service is 2023.
In early 2022, SCE reviewed in-flight covered conductor scope for 2022 and 2023 that was still in earlier stages for alignment to the IWMS Risk Framework. Based on those reviews, SCE made decisions to either continue the mitigation as-is, target for higher risk mitigation activity, or stop scope completely.
a) How does SCE evaluate the effectiveness of the IWMS Risk Framework in prioritizing mitigation selection and scope for grid hardening activities?
b) How does SCE evaluate the effectiveness of the IWMS Risk Framework in prioritizing mitigation selection and scope for inspection programs?
c) How does SCE evaluate the effectiveness of the IWMS Risk Framework in prioritizing mitigation selection and scope for vegetation management activities?
d) Please explain the criteria SCE used in 2022 to determine whether to continue mitigation as-is, target for higher risk mitigation activity, or stop scope completely during the review of in-flight covered conductor scope?

Response to Question 02:

a) How does SCE evaluate the effectiveness of the IWMS Risk Framework in prioritizing mitigation selection and scope for grid hardening activities?

The IWMS Risk Framework is an evolution of SCE's previous risk reduction model that incorporates additional factors such as egress concerns and Communities of Elevated Fire Concern into its consequence modeling to prescribe the appropriate risk mitigation activity and prioritize deployment. As SCE stated in its WMP (page 102), due to the long lead time for planning and construction for covered conductor and undergrounding, the earliest that hardening mitigations scoped with the IWMS Risk Framework will be placed in-service is 2023. As data from 2023 and beyond becomes available, SCE will have more data to evaluate the effectiveness of its IWMS Risk Framework.

In addition, SCE also notes that as stated on page 3 of its WMP, "…the number of acres burned and structures destroyed in 2021-2022 were 92% and 98% lower, respectively, despite continued extreme drought and wind conditions. Further, there have not been any fires associated with covered conductor caused by risk drivers that covered conductor was designed to directly address." Since IWMS builds upon the previous risk framework, SCE notes that data thus far supports the soundness of its overall wildfire mitigation strategy, including IWMS and the focus on hardening mitigations such as covered conductor.

b) How does SCE evaluate the effectiveness of the IWMS Risk Framework in prioritizing mitigation selection and scope for inspection programs?

SCE's inspection programs are currently in the process of transitioning to utilization of the IWMS Risk Framework, and as such there is no data at this time to specifically evaluate the effectiveness of applying IWMS to inspections. However, SCE again refers to the summary data that it provided on WMP page 3: "We have also seen approximately 53% less tree-caused electrical faults and a decrease of 61% in asset conditions found from inspections that require remediation, even with updating the inspection form to include additional items and conditions to inspect for." As discussed in the response to part a), IWMS builds upon the previous model which has proven to be effective in reducing targeted risks.

c) How does SCE evaluate the effectiveness of the IWMS Risk Framework in prioritizing mitigation selection and scope for vegetation management activities?

Please see the responses above to part b), as the same timing issue is relevant to the use of IWMS for vegetation management activities.

d) Please explain the criteria SCE used in 2022 to determine whether to continue mitigation as-is, target for higher risk mitigation activity, or stop scope completely during the review of in-flight covered conductor scope?

The following are high-level decision criteria used during the review of in-flight work orders. Note that while these criteria provide directional guidance, work orders recommended to be converted to higher risk mitigation activities such as targeted undergrounding (TUG) are subject to additional merit and feasibility reviews. Factors considered to move forward include SCE's Integrated Wildfire Mitigation Strategy (IWMS), SME input on wildfire risk, construction feasibility/difficulty, projected project timeline, and cost.

For example, criteria for converting a WCCP Work Order to TUG includes considerations made for:

- Egress concerns
- Locations in forested areas
- Presence of strike trees across multiple spans
- Residential area surrounded by open space containing large amount of potential for dry fuel

- Locations in highly populated area with consequence threshold above 10,000 acres burned in 8 hours
- PSPS impacts that may not be mitigated by covered conductor
- Historical Landmarks

Criteria for keeping a WCCP Work Order As-is includes:

- Low lying brush/vegetation
- Non-residential area with open space containing burnable fuels
- Residential area with minimal to moderate burnable fuels
- PSPS impact that could be mitigated by covered conductor
- High consequence areas that could burn 300-10,000 acres in 8 hours
- Moderate to large amount of fuel near residential area
- Qualifies for TUG, but undergrounding is infeasible
- Operational considerations (i.e. work order is in between areas that are scoped for CC)

Criteria to Cancel WCCP Work Orders includes:

- Urbanized
- Minimal to no fuel
- Low consequence scores