

November 1, 2021

E-Filing Docket # 2021-WMP

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's 2021 Wildfire Mitigation Plan Update Change Order Report

Dear Director Thomas Jacobs,

Consistent with the Office of Energy Infrastructure Safety's (OEIS or Energy Safety) Final Action Statement on Southern California Edison Company's (SCE) 2021 Wildfire Mitigation Plan (WMP) Update and OEIS's October 6, 2021 Final Change Order Process, SCE hereby submits its Change Order Report describing changes to wildfire activities set forth in its 2021 WMP Update and other changes under consideration as new information becomes available and as SCE gains experience and measures the outcomes of its initiatives.

BACKGROUND

On August 18, 2021, Energy Safety approved SCE's 2021 WMP Update and on August 20, 2021 the Commission issued Resolution WSD-020, ratifying SCE's Final Action Statement.

The Final Action Statement on the 2021 WMP Update of SCE directed the electrical corporations to submit a Change Order Report on November 1, 2021 that describes changes to WMP programs and initiatives being considered by the electrical corporation. As stated, "[t]he goal of this process is to ensure that utilities make significant changes to their WMPs only if the utilities demonstrate these changes to be improvements per WMP approval criteria (i.e., completeness, technical feasibility, effectiveness, and resource use efficiency). Another goal of the change order process is to maximize Energy Safety's visibility and ability to respond to any significant changes to the approved plan as efficiently and in as streamlined a way as possible."¹

Subsequently, Energy Safety issued its Final Change Order Process on October 6, 2021. In addition to the written guidelines, SCE is applying further verbal guidance from Energy Safety staff received during discussions on October 15, 2021 (see Appendices A and B).

¹ SCE's Final Action Statement, p. 109.

This Change Order Report does not include changes to initiatives that are still being evaluated and/or anticipated for the year 2022 and beyond. As SCE explained in its 2021 WMP Update (Revision),² efforts to improve SCE’s wildfire risk reduction programs and strategies will continue to evolve based on new information and analysis.

PROPOSED CHANGES

Grid Design and System Hardening Initiative Changes

i. The Proposed Change - Undergrounding of Overhead Conductor (SH-2):

- a. The initiative being altered with reference to where in the WMP the initiative is discussed, type of change proposed, along with the planned budget:

2021 WMP Update Initiative	Undergrounding of Overhead Conductor, SH-2
2021 WMP Update Section	Section 7.3.3.16, pp. 227-228
Proposed Change / Type	Other Change-Cost Efficiency
2021 Planned Spend	\$26.4 million Source: Table 12, Undergrounding of electric lines and/or equipment, 7.3.3.16, Undergrounding of Overhead Conductor, SH-2
Amount Already Spent in 2021 YTD	\$2.3 million as of September 2021
Planned Spend Remainder of 2021³	\$11.8 million
2021 Revised Forecast	\$14.1 million
Redeployment of Funds in 2021 (how much and to/from which budget)	No funds have been identified for redeployment to/from this activity

- b. Detailed description of proposed change

SCE is still committed to completing the scope of targeted undergrounding included in its 2021 WMP update. Only the cost forecast is being updated based on recorded costs this year. The

² The 2021 WMP Update referenced throughout this Change Orders Report refers to the SCE 2021 WMP Revision - CLEAN, submitted on June 3, 2021.

³ Forecasted spend is provided for 2021; 2022 forecast will be provided in SCE’s 2022 WMP Update submission.

difference between previously forecast costs and current forecasts is primarily due to two factors. First, SCE had previously used the average cost for past Rule 20A projects to estimate high level unit costs (average of \$3.4M based on a range of \$1.8M to \$5.2M per mile). However, the wildfire mitigation projects in scope in 2021 did not require undergrounding telecommunications or secondary lines included in Rule 20A conversions. Second, the locations targeted in 2021 were selected based on ease of terrain, accessibility, permitting and environmental issues which incurred less costs than average or what is expected for future scope.

Though the revised cost forecast for 2021 scope is lower than previously estimated, it is still within the Rule 20A cost range and undergrounding remains a considerably more lengthy and costly mitigation than other approaches to mitigating overhead bare conductor risk. In addition to lengthy deployment time and comparatively high unit costs, undergrounding can also require more miles to be installed than what is required for an overhead route, for example to bypass rocky terrain or sloping areas, or obtain easements. For targeted undergrounding in 2021, this will result in an average of approximately 20 percent more miles of undergrounding per project than was previously required by the overhead circuitry. Given the relative ease of terrain in 2021, this average could be much higher for more difficult terrain in the future.

ii. Justification of the Proposed Change:

- a. In what way, if any, does the change address or improve completeness, technical feasibility, effectiveness, or resource use efficiency:

The change does not address or improve completeness, technical feasibility, effectiveness, or efficiency. Rather, the change is being made to update the cost forecast to reflect reduced cost estimates for undergrounding work in 2021. SCE will utilize these findings as appropriate in its future estimates for targeted undergrounding.

iii. Change in Expected Outcomes from the Proposed Change:

- a. What outcomes, including quantitative ignition probability and PSPS risk reduction, was the changed initiative expected to achieve in the 2021 WMP?

In terms of probability of ignition (POI) reduction, SCE estimated that targeted undergrounding is extremely effective in mitigating contact from foreign object (CFO) and equipment and facility failure (EFF) drivers. Targeted undergrounding is also extremely effective in mitigating PSPS risk so long as the full circuit or isolatable segment is fully undergrounded.

- b. What outcomes, including quantitative ignition probability and PSPS risk reduction, will the initiative deliver with the proposed adjustment?

This cost outlook change is not a result of a change to the estimates for targeted undergrounding's POI mitigation effectiveness or PSPS risk reduction.

Asset Management & Inspections Initiative Changes

i. The Proposed Change - Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations (IN-1.1):

- a. The initiative being altered with reference to where in the WMP the initiative is discussed, type of change proposed, along with the planned budget:

2021 WMP Update Initiative	Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, IN-1.1
2021 WMP Update Section	Section 7.3.4.9.1, pp. 241-245
Proposed Change / Type	<ul style="list-style-type: none"> • Decrease in Scale of Remediations • Other Change-Cost Efficiency
2021 Planned Spend	\$252.1 million Source: Table 12, Other discretionary inspection of distribution electric lines and equipment, beyond inspections mandated by rules and regulations, 7.3.4.9.1, Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, <i>IN-1.1</i>
Amount Already Spent in 2021 YTD	\$92.1 million as of September 2021
Planned Spend Remainder of 2021⁴	\$17.0 million
2021 Revised Forecast⁵	\$109.1 million
Redeployment of Funds in 2021 (how much and to/from which budget)	No funds have been identified for redeployment to/from this activity

- b. Detailed description of proposed change

The current 2021 outlook for Distribution HFRI is lower than the forecasted costs in the 2021 WMP due to lower find rate of remediations than expected from inspections, cost efficiencies from bundling remediations with other programmatic work, and execution constraints.

In order to forecast the remediation portion of HFRI, SCE relied on historical find rates (i.e., the percentage of inspections that identify the need for a remediation). Notably, the assumed find

⁴ Forecasted spend is provided for 2021; 2022 forecast will be provided in SCE's 2022 WMP Update submission.

⁵ Consistent with dollars shown in the 2021 WMP Table 12, the spend referenced here is for HFRI and Areas of Concern (AOC) scope, although the 2021 WMP narrative and associated targets also include scope for compliance inspections.

rate for Distribution HFRI ground inspections in the 2021 WMP Update was 7.0%, based on inspections as of mid-year 2020. The actual find rate in 2021 has since come down to 5.7%. This lower find rate even with more stringent inspection criteria is a preliminary indication that SCE's efforts in prior years, including maintenance and grid hardening, are yielding positive returns in terms of inspection findings.

Whenever operationally feasible, SCE bundles different types of work by location to reduce costs. For instance, an inspection may identify a Priority 2 (P2)⁶ finding on a structure that is also associated with an in-flight covered conductor segment installation. Rather than sending two crews out to the same location weeks or even days apart, SCE will complete both mitigations using the same crew at the same time while meeting compliance timelines for the P2 remediation. SCE was able to successfully bundle much of the HFRI remediations which reduced costs by approximately \$35M.

Lastly, execution constraints due to external factors such as environmental permitting and internal factors such as crew resource constraints, including limited crew flexibility due to COVID-19, are also contributing to the lower outlook. SCE continues to work with applicable entities to address external factors and has plans in place to address internal factors to limit or eliminate the impact of these factors on performing remediation work.

ii. Justification of the Proposed Change:

- a. In what way, if any, does the change address or improve completeness, technical feasibility, effectiveness, or resource use efficiency:

This change does not address or improve completeness, technical feasibility, or effectiveness. It does, however, address resource use efficiency via operational efficiencies related to the bundling of remediation work. Additionally, it reflects the results of a lower remediation find rate that may be in part a result of prior maintenance and grid hardening efforts.

iii. Change in Expected Outcomes from the Proposed Change:

- a. What outcomes, including quantitative ignition probability and PSPS risk reduction, was the changed initiative expected to achieve in the 2021 WMP?

In terms of POI reduction, SCE estimated that Distribution HFRI is very effective in mitigating CFO-vegetation contact, CFO-animal contact, and many EFF drivers.

- b. What outcomes, including quantitative ignition probability and PSPS risk reduction, will the initiative deliver with the proposed adjustment?

This cost outlook change is not a result of a change to the estimates for Distribution HFRI's POI mitigation effectiveness. However, due to the internal constraints described above, some

⁶ P2 issues are lower risk and therefore remediation work is scheduled to be completed within 6 or 12 months depending on the HFTD tier.

portion of the risk reduction benefits will be delayed. Approximately 5% of remediations planned for completion in 2021 may roll into early 2022.

i. The Proposed Change - Transmission High Fire Risk-Informed (HFRI) Inspections and Remediations (IN-1.2):

- a. The initiative being altered with reference to where in the WMP the initiative is discussed, type of change proposed, along with the planned budget:

2021 WMP Update Initiative	Transmission High Fire Risk-Informed (HFRI) Inspections and Remediations, IN-1.2
2021 WMP Update Section	Section 7.3.4.10.1, pp. 247-251
Proposed Change / Type	<ul style="list-style-type: none"> • Decrease in Scale of Remediations • Other Change-Cost Efficiency
2021 Planned Spend	\$75.9 million Source: Table 12, Other discretionary inspection of Transmission electric lines and equipment, beyond inspections mandated by rules and regulations, 7.3.4.10.1, Transmission High Fire Risk-Informed (HFRI) Inspections and Remediations, IN-1.2
Amount Already Spent in 2021 YTD	\$31.5 million as of September 2021
Planned Spend Remainder of 2021⁴	\$20.9 million
2021 Revised Forecast⁷	\$52.4 million
Redeployment of Funds in 2021 (how much and to/from which budget)	No funds have been identified for redeployment for this activity

- b. Detailed description of proposed change

Similar to Distribution HFRI Inspections and Remediations, the current 2021 outlook for Transmission HFRI Inspections and Remediations is lower than forecast in the 2021 WMP due to lower a remediation find rate from inspections and execution constraints.

In order to forecast the remediation portion of HFRI, SCE relied on historical find rates (i.e., the percentage of inspections that identify the need for a remediation). Notably, the assumed find

⁷ Consistent with dollars shown in the 2021 WMP Update Table 12, the spend referenced here is for HFRI and Areas of Concern (AOC) scope, although the 2021 WMP Update narrative and associated targets also include scope for compliance inspections.

rate for Transmission HFRI ground inspections in the 2021 WMP Update was 23%, but the actual find rate in 2021 has been 12%. This lower find rate even with more stringent inspection criteria is a preliminary indication that SCE's efforts in prior years, including maintenance and grid hardening, are yielding positive returns in terms of inspection findings.

Related to execution constraints, external factors such as environmental permitting and internal factors such as crew and design resource constraints, including limited crew flexibility due to COVID-19, are also contributing to the lower outlook. SCE continues to work with applicable entities to address external factors and has plans in place to address internal factors to limit or eliminate the impact of these factors on performing remediation work.

ii. Justification of the Proposed Change:

- a. In what way, if any, does the change address or improve completeness, technical feasibility, effectiveness, or resource use efficiency:

This change does not address or improve completeness, effectiveness, technical feasibility, or resource use efficiency. It reflects the results of a lower remediation find rate that may be in part a result of prior maintenance and grid hardening efforts.

iii. Change in Expected Outcomes from the Proposed Change:

- a. What outcomes, including quantitative ignition probability and PSPS risk reduction, was the changed initiative expected to achieve in the 2021 WMP?

In terms of POI reduction, SCE estimated that Transmission HFRI is very effective in mitigating CFO-vegetation contact, CFO-animal contact, and many EFF drivers.

- b. What outcomes, including quantitative ignition probability and PSPS risk reduction, will the initiative deliver with the proposed adjustment?

This cost outlook change is not a result of a change to the estimates for Transmission HFRI's POI mitigation effectiveness. However, due to the internal constraints described above, some portion of the risk reduction benefits will be delayed. Approximately 5% of remediations planned for completion in 2021 may roll into early 2022.

Vegetation Management and Inspections Initiative Changes

i. The Proposed Change – Hazard Tree Mitigation Program (VM-1):

- a. The initiative being altered, with reference to where in the WMP the initiative is discussed, type of change proposed, along with the planned budget:

2021 WMP Update Initiative	Hazard Tree Mitigation Program (HTMP), VM-1
2021 WMP Update Section	Section 7.3.5.16.1, pp. 277-279
Proposed Change / Type	Decrease in scale
2021 Planned Spend	\$80.7 million Source: Table 12, Removal and remediation of trees with strike potential to electric lines and equipment, 7.3.5.16.1, Hazard Tree Mitigation Program, VM-1
Amount Already Spent in 2021 YTD	\$17.2 million as of September 2021
Planned Spend Remainder of 2021⁸	\$19.7 million
2021 Revised Forecast	\$36.9 million
Redeployment of Funds in 2021 (how much and to/from which budget)	No funds have been identified for redeployment for this activity

b. Detailed description of proposed change

The decrease in scale of HTMP in 2021 is primarily due to: (1) a lower than anticipated find rate of trees with strike potential (i.e., subject trees) resulting from inspections, and (2) a lower than anticipated number of subject trees that require subsequent mitigation.

- (1) Although SCE has exceeded the number of circuits that it planned to patrol in 2021 (383 as of October 1 compared to 322 planned for the entire year), SCE found fewer trees with strike potential (subject trees) than originally forecasted, and therefore fewer assessments were performed. The 2021 forecast was based on 25 assessments per assessor per day and the year to date recorded is 14 assessments per assessor per day. Accordingly, SCE expects to complete 120,000 – 130,000 assessments in 2021 rather than the 150,000 originally forecast.
- (2) Of the subject trees assessed, a lower number than forecasted have met the criteria of a hazard tree needing mitigation. The original forecast was based on an average historical prescription rate of 8% but the actual prescription rate for assessments performed in 2021 has averaged closer to 5%. Additionally, compliance with environmental regulations has resulted in delays for subsequent tree removals and mitigations in 2021.

⁸ Forecasted spend is provided for 2021; 2022 forecast will be provided in SCE’s 2022 WMP Update submission.

SCE has also reduced its forecast for HTMP removals and mitigations from 15,000 to 2,900.

ii. Justification of the Proposed Change:

- a. In what way, if any, does the change address or improve completeness, technical feasibility, effectiveness, or resource use efficiency:

The change does not address or improve completeness, technical feasibility, effectiveness, or resource use efficiency. SCE will exceed the volume of circuits planned for inspection in 2021, which will reduce the necessary scope for future years. The prescribed removals/mitigations are expected to be completed as planned.

iii. Change in Expected Outcomes from the Proposed Change:

- a. What outcomes, including quantitative ignition probability and PSPS risk reduction, was the changed initiative expected to achieve in the 2021 WMP?

HTMP, inclusive of inspections and remediations, is designed to identify risk through inspections and take a prioritized approach to remediate the identified risk across SCE’s HFRA. In terms of POI reduction, SCE estimated that HTMP was very effective in mitigating Contact from Object (CFO)-vegetation contact.

- b. What outcomes, including quantitative ignition probability and PSPS risk reduction, will the initiative deliver with the proposed adjustment?

This outlook change is not a result of a change to the estimates for HTMP’s POI mitigation effectiveness.

i. The Proposed Change – Dead and Dying Tree Removal (VM-4):

- a. The initiative being altered with reference to where in the WMP the initiative is discussed, type of change proposed, along with the planned budget:

2021 WMP Update Initiative	Dead and Dying Tree Removal, VM-4
2021 WMP Update Section	Section 7.3.5.16.2, pp. 279-280
Proposed Change / Type	Decrease in scale
2021 Planned Spend	\$43.4 million Source: Table 12, Removal and remediation of trees with strike potential to electric lines and equipment, 7.3.5.16.2, Dead and Dying Tree Removal, VM-4

Amount Already Spent in 2021 YTD	\$11.3 million as of September 2021
Planned Spend Remainder of 2021⁹	\$7.2 million
2021 Revised Forecast	\$18.5 million
Redeployment of Funds in 2021 (how much and to/from which budget)	No funds have been identified for redeployment for this activity

b. Detailed description of proposed change

The decrease in scale of the Dead and Dying Tree Removal Program is primarily due to a lower than anticipated find rate of dead, dying, and diseased trees, resulting in less work needing to be completed. Circuit patrols continue to be performed as planned for the year, however, the volume of trees in need of removal is lower than anticipated.

ii. Justification of the Proposed Change:

- a. In what way, if any, does the change address or improve completeness, technical feasibility, effectiveness, or resource use efficiency:

The change does not address or improve completeness, technical feasibility, effectiveness, or efficiency. All circuit patrols will be completed as planned, and prescribed removals are expected to be completed consistent with program guidelines. The original forecast was based on average historical data of 15,000 annual tree removals. The update is based on current projected tree removals for which SCE has access and authority to perform. Accordingly, SCE has reduced its 2021 forecast for Dead and Dying Tree removals from 15,000 to 3,400.

iii. Change in Expected Outcomes from the Proposed Change:

- a. What outcomes, including quantitative ignition probability and PSPS risk reduction, was the changed initiative expected to achieve in the 2021 WMP?

SCE’s Dead and Dying Tree Program, inclusive of inspections and remediations, is designed to identify risk through inspections and take a prioritized approach to remediate the identified risk across SCE’s HFRA. In terms of POI reduction, SCE estimated that the Dead and Dying Tree Program was very effective in mitigating CFO-vegetation contact.

⁹ Forecasted spend is provided for 2021; 2022 forecast will be provided in SCE’s 2022 WMP Update submission.

- b. What outcomes, including quantitative ignition probability and PSPS risk reduction, will the initiative deliver with the proposed adjustment?

This outlook change is not a result of a change to the estimates for the Dead and Dying Tree Program’s POI mitigation effectiveness.

Public Safety Power Shutoff Initiative Changes

i. The Proposed Change – Customer Care Programs (PSPS-2):

- a. The initiative being altered with reference to where in the WMP the initiative is discussed, type of change proposed, along with the planned budget:

2021 WMP Update Initiative	Customer Care Programs, PSPS-2
2021 WMP Update Section	Section 7.3.6.5.2, pp. 293
Proposed Change / Type	Increase in scale
2021 Planned Spend	\$55.8 million Source: Table 12, PSPS events and mitigation of PSPS impacts, 7.3.6.5.2, Customer Care Programs, PSPS-2
Amount Already Spent in 2021 YTD	\$44.5 million as of September 2021
Planned Spend Remainder of 2021¹⁰	\$23.3 million
2021 Revised Forecast	\$67.8 million
Redeployment of Funds in 2021 (how much and to/from which budget)	No funds have been identified for redeployment for this activity

¹⁰ Forecasted spend is provided for 2021; 2022 forecast will be provided in SCE’s 2022 WMP Update submission.

b. Detailed description of proposed change

SCE's Customer Care Program Initiative consists of several work streams. The primary drivers of the cost increase are sce.com website enhancements and PSPS process improvements and expanding the Critical Care Backup Battery (CCBB) program. Other changes include modifying the Residential Battery Station and Well Water and Water Pumping Backup Generation programs.

The website enhancements and PSPS process improvements are consistent with SCE's February 12, 2021 PPS Action Plan, described in SCE's 2021 WMP Update Revision.¹¹ The website enhancements allow customers to view current or planned interruptions of service, including estimated restoration time, and benefit from other map-based improvements that can help users to identify the location of outages by city, Community Resource Centers (CRCs), Community Crew Vehicles (CCVs) and electric vehicle (EV) charging stations. The PPS process improvements include process automation, a centralized data platform, and software enhancements, which improve the timeliness and accuracy of customer notifications. These enhancements and improvements collectively represent a 2021 cost increase of approximately \$10M.

For CCBB, the 2021 WMP Update forecast was based on the program's 2020 performance of 30% deployment of batteries to eligible customers in 2020. However, SCE has successfully increased customer response rate this year. SCE implemented several changes to the program including:

- Expanding CCBB eligibility starting in 2021 from Critical Care Medical Baseline (MBL) customers who reside in HFRA and are enrolled in CARE or FERA to all MBL customers who reside in HFRA and are enrolled in CARE or FERA
- Enhancing marketing and outreach by adding tactics, such as social media and community-based organization (CBO) engagement, to supplement direct mail and outbound phone calls
- Increasing door-to-door outreach efforts by SCE vendors, which were limited in 2020 due to COVID-19

As a result of these continued efforts, SCE expects it will deploy up to 6,000 batteries in 2021, which represents an increase from SCE's 2021 WMP Update forecast of 3,600 batteries, for a cost increase of approximately \$6M.

Changes have also been made to the Residential Battery Station and Well Water and Water Pumping Backup Generation programs. At the beginning of 2021, the Residential Battery Station program offered all SCE customers a \$50 rebate to purchase a backup portable battery for their home. On July 1, 2021, the program increased the rebate amount offered from \$50 to \$75 but limited eligibility to customers residing in or receiving power from a circuit that traverses an HFRA. The total number of eligible customer accounts for this program is now approximately 1.3 million. The Well Water and Water Pumping Backup Generation program offered a \$300 rebate for the purchase of a qualified generator to customers residing in HFRA

¹¹ SCE 2021 WMP Revision (CLEAN), p. 370

or receive power from a circuit that traverses an HFRA and living in a well water-dependent community or communities without access to municipal water suppliers. A \$500 rebate for the Well Water and Water Pumping Backup Generation program was also offered to eligible customers who are also enrolled in CARE or FERA. This program was modified on July 1, 2021, by expanding eligibility to all SCE customers in HFRA or who receive power from a circuit that traverses an HFRA and removing the previous water pumping dependency requirement. The program now offers a \$200 (replacing the \$300 rebate) rebate to customers residing in HFRA or receiving power from a circuit that traverses an HFRA (approximately 1.3 million customer accounts) and a \$500 rebate to customers enrolled in CARE, FERA, or MBL and residing in HFRA or receiving power from a circuit that traverses an HFRA. Although these program changes are expected to have minimal impact on the 2021 cost forecast, they are expected to result in an increase in customer participation.

ii. Justification of the Proposed Change:

These changes enhance the technical feasibility of customers navigating the sce.com website and understanding how they are or could be affected by a PSPS event and improve the timeliness and accuracy of customer notifications, thereby enabling greater customer situational awareness. In addition, the modifications to certain backup battery and rebate programs expand the pool of customers eligible to receive such assistance and thereby help improve customer resiliency during PSPS events.

iii. Change in Expected Outcomes from the Proposed Change:

- a. What outcomes, including quantitative ignition probability and PSPS risk reduction, was the changed initiative expected to achieve in the 2021 WMP?

SCE developed the CCBB and rebate programs above to provide customers with financial assistance in developing their resiliency to prepare for the impact from PSPS events. PSPS events can impact our customers, especially those relying on critical life-sustaining medical devices and those dependent on well water pumping. This initiative does not reduce the probability or consequence of ignitions, but rather reduces the consequence of PSPS events.

In terms of PSPS consequence reduction, SCE estimated that CCBB program was moderately effective in mitigating safety, reliability, and financial consequences.

- b. What outcomes, including quantitative ignition probability and PSPS risk reduction, will the initiative deliver with the proposed adjustment?

This outlook change is not a result of a change to the estimated PSPS risk reduction effectiveness of these programs. However, the increase in CCBB customer response rates, in particular, has effectively resulted in more PSPS consequence risk reduction in 2021 than was

assumed in SCE's 2021 WMP Update, given that the number of batteries deployed is now projected at up to 6,000 by year-end, versus the initial assumption of 3,600.

Sincerely,

//s//

Michael Backstrom
Vice President, Regulatory Policy
Southern California Edison

cc: CALFIREUtilityFireMitigationUnit@fire.ca.gov

Appendix A
Written Guidelines per OEIS on 10/6/21

If a utility seeks to significantly modify (i.e., reduce, increase, or end) WMP mitigation measures in response to data and results on utility ignition risk reduction impacts, the utility must submit a Change Order Report. At a high level, the objective of the Change Order process is to ensure the utility continues to follow the most effective and efficient approach to mitigating its wildfire risk. This could change as new information becomes available and as the utility gains experience and measures the outcomes of its initiatives. The Change Order Report must include significant shifts in the WMPs starting from the date the WMP has been submitted to Energy Safety for review (i.e., in February and March 2021).

The Change Order process set forth herein provides a mechanism for the utility to make adjustments based on this information and experience. The goal of this process is to ensure that utilities make significant changes to their WMPs only if the utilities demonstrate these changes to be improvements per WMP approval criteria (i.e., completeness, technical feasibility, effectiveness, and resource use efficiency). Another goal of the Change Order process is to maximize Energy Safety's visibility and ability to respond to any significant changes to the approved WMP as efficiently and in as streamlined a way as possible. Finally, a Change Order allows the utility to explain whether a change is intentional or inadvertent.

A "significant" change to a utility's WMP that would trigger the Change Order process is defined below:

- A change falls into the following initiative categories, i) risk assessment and mapping, ii) vegetation management and inspections, iv) grid design and system hardening, or v) asset management and inspections.

or

- A change to the utility's PSPS strategy, protocols and/or decision-making criteria.

and

- Meets one or more of the following criteria:
 - o A change that would result in an increase or decrease of more than \$10 million or constituting a greater than 20% change in an initiative's planned total expenditure.
 - o A change that reduces or increases the estimated risk reduction value of an initiative by more than 25%.
 - o A change that results in the modification of a WMP initiative target by greater than or equal to 5%. Targets are identified in Table 5.3-1 included in the 2021 WMP Guidance and through QIU submissions as described in Compliance Guidance (i.e., number of trees trimmed, miles of power lines hardened, or poles inspected). Energy Safety expects these two sources of information to be identical.
 - o A change that results in a significant shift of either the strategic direction or purpose of an initiative (i.e., introducing use of a novel risk model that reverses the risk profile of the utility's circuits).

If a utility is unsure whether a change is significant, the utility is encouraged to discuss the change informally with Energy Safety in advance of submission of a Change Order Report via email to safetypolicy@energysafety.ca.gov. The Change Order process is not intended to allow utilities to unilaterally change their WMP initiatives and program targets; rather, its purpose is to provide a mechanism for refining certain elements of WMP initiatives when there is demonstrable quantitative and qualitative justification for doing so.

Submission of Change Order Reports

Utilities shall submit any Change Order Reports as soon as they have confirmed the change, with a final deadline by 5:00 p.m. on November 1, 2021. Energy Safety will review change orders and may issue either an approval or a denial if proposed changes are deemed to be materially out of alignment with Energy Safety's goals. At a minimum, each proposed Change Order shall provide the following information:

- i. The proposed change
 - a. The initiative being altered with reference to where in the WMP the initiative is discussed
 - b. The planned budget of that initiative, including:
 - i. Planned spend in the 2021 WMP of the initiative being altered
 - ii. Of the planned spend identified in i. above, how much has already been spent
 - iii. Planned spend for the remainder of the WMP plan period
 - iv. If spend is being redeployed, how much is being redeployed and to/from which budget
 - c. The type of change being proposed, reported as one of the following:
 - i. Increase in scale
 - ii. Decrease in scale
 - iii. Change in prioritization
 - iv. Change in deployment timing
 - v. Change in work being done
 - vi. Other change (described)
 - d. A detailed description of the proposed change
- ii. Justification for the proposed change
 - a. In what way, if any, does the change address or improve:
 - i. Completeness
 - ii. Technical feasibility of the initiative
 - iii. Effectiveness of the initiative
 - iv. Resource use efficiency over portfolio of WMP initiatives
- iii. Change in expected outcomes from the proposed change
 - a. What outcomes, including quantitative ignition probability and PSPS risk reduction, was the changed initiative expected to achieve in the 2021 WMP Update?
 - b. What outcomes, including quantitative ignition probability and PSPS risk reduction, will the initiative deliver with the proposed adjustment?

Submission of Change Order Reports shall be through Energy Safety's e-filing system. Change Order Reports must be submitted to the 2021 WMPs Docket (docket #2021-WMPs). Utilities shall concurrently serve all reports on the Department of Forestry and Fire Protection at CALFIREUtilityFireMitigationUnit@fire.ca.gov.

Appendix B

Updated Oral Guidance from OEIS in Discussion with PG&E, SCE and SDG&E on 10/15/21

- Err on the side of over-inclusion where the criteria thresholds are concerned (i.e., include activities even if the driver is more execution variance than risk-informed)
- Update the financial criterion from \$10M *or* 20% to \$10M *and* 20% (the conjunction change was unintentional)
- For the 5% target change, utilities should include material changes
- OEIS will separately follow up on how to position any target changes in the QIU