

Southern California Edison
***WSD-001 – Resolution WSD-001 to Establish Procedures for the Wildfire Safety Division's
Review of 2020 Wildfire Mitigation Plans Pursuant to PUC Sections 8386 and 8386.3***

DATA REQUEST SET T U R N - S C E - 0 0 3

To: TURN
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Received Date: 3/5/2020

Response Date: 3/9/2020

Question 005:

Please provide a RSE for each mitigation in SCE's Tables 21-29 identified as "enabling," "compliance," "where the "purpose of the assessment is to learn and assess the effectiveness of the mitigation," and those where there is "insufficient data." For each, identify the assumptions that are required to calculate the RSE.

Response to Question 005:

SCE has previously responded to a similar question in the following WSD data request "2020 WSD-01 WMP Data Request.xlsx", item "SCE-43879-F-96." The response was as follows:

SCE did not provide RSEs for initiatives that fell into the following categories:

- 1) Pilot projects: No RSE was developed for these initiatives because their deployment is at a limited scale and SCE is still determining their level of mitigation effectiveness. Examples include distributed fault anticipation and meter alarming for downed energized conductor.
- 2) Traditional programs: No RSE was developed for these initiatives because it is difficult to measure the incremental impact of a preexisting program. To determine the incremental amount of risk reduced by a specific initiative, there must be a baseline level of risk to start from. For example, SCE recently implemented its Hazard Tree Management Program (HTMP). SCE had data on how many tree-caused circuit interruptions (TCCIs) occurred prior to implementation of the HTMP and thus could estimate how much incremental risk the HTMP could mitigate. On the other hand, SCE has been performing vegetation management to achieve clearances around electric lines and equipment for decades. SCE does not have data on how many TCCIs occurred prior to SCE performing this traditional program and thus cannot develop an RSE for it.
- 3) Enabling activities: A separate RSE was not developed for these initiatives because they do not directly reduce the risk of wildfire. However, they do directly support a wildfire initiative that does reduce wildfire risk. An example of an Enabling activity are de-energization notifications. They do not directly reduce the risk of wildfire but they directly support public safety power shutoffs (PSPS), which do reduce wildfire risk. Accordingly, the cost of de-energization notifications are taken into account when developing the RSE for PSPS.

4) Supporting activities: No RSE was developed for these initiatives because they do not directly reduce the risk of wildfire. However, a utility is justified in implementing them. For example, an “adequate and trained workforce for service restoration” or “customer support” in emergencies do not directly reduce any risk driver for wildfires, yet are essential services that a utility must provide to its customers.

5) Activities with insufficient data: An RSE was not developed for these activities because there is insufficient data to determine the amount of risk that will be reduced. Examples of this are inspections of and expanded clearance of vegetation from legacy facilities. Historical ignition information was not tracked for these types of facilities and thus it is difficult to estimate the amount of risk that will be reduced by these programs. Yet a utility is justified in engaging in these initiatives given the nature of the equipment and their location in HFRA.

SCE has justified in its 2021 GRC, or will justify in Track 2 testimony, its spending request for all such activities. SCE will use a methodology for calculating RSEs for ongoing or compliance activities if such a methodology is adopted in the ongoing SMAP proceeding in future WMP and RAMP filings. SCE looks forward to working with stakeholders to develop such a methodology.