

*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**  
**Prepared by: Shinjini Menon**  
**Job Title: Director Energy Policy**  
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**Response Date: 3/9/2020**

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**Question 007:**

At page 6 of the Executive Summary, SCE states regarding resource and other constraints: “SCE considers these additional factors while determining the type and volume of work undertaken to reduce wildfire risks in a timely manner, while managing customer impact of mitigation measures.”

- a. Please identify all constraints considered by SCE.
- b. How has SCE quantified the identified constraints?
- c. How has SCE memorialized how these constraints were used in its decision-making?

**Response to Question 007:**

- a. As mentioned on page 6 of SCE’s 2020-2022 WMP Executive Summary, SCE considers several factors when deciding what work is undertaken for wildfire mitigation and related activities.

Some examples are:

- Labor resource constraints – primarily planners, electrical crews and tree trimming crews. There is a state-wide shortage of qualified workers. SCE is attracting and retaining resources using modified contract agreements to the extent feasible.
- Operational constraints – procuring or developing new work methods, procuring materials, and the associated lead time for training and deployment. An example is aerial inspections which required contracting helicopters, outfitting them with appropriate equipment, changing work responsibilities for engineers and qualified electrical workers to identify equipment conditions from photographs, and technology changes associated with image processing and storage. As another example, SCE’s Planning department faces constraints related to training including how much training can be conducted at a time, training duration and frequency to help ensure the training is effective, and how much new staffing can be accommodated within existing work teams without impacting overall production.
- Execution constraints – Some activities take longer to plan and execute, and the lead times need to be balanced with risk reduction. An example is undergrounding. Not only is undergrounding significantly more expensive to install and maintain, it takes longer to plan and install compared to covered conductors which can be deployed relatively quickly to protect communities in HFRA. Execution constraints also include permitting and coordination with external partners/agencies such as environmental agencies, joint owners, cities and customers.
- Regulatory constraints – To be substantially compliant, SCE has to prioritize meeting

regulatory requirements regardless of how effective and cost efficient they are in reducing risks. These may divert financial and labor resources from other activities.

- Customer impact constraints – Some activities, such as PSPS, may have relatively higher RSE. But given the customer and community impact of PSPS, other activities that not only reduce ignition risks, but also reduce PSPS frequency and impact have to be considered.
  - Targeted risk reduction – Though not a constraint, SCE is focused on substantially reducing ignition risks broadly across the territory. There may be activities that are better suited in localized areas, but at this time SCE is prioritizing activities that can be deployed broadly across its service area. In addition, some activities, such as pole brushing are relative risk-spend-efficient, but by itself is not expected to reduce ignition risks significantly and as such, pole brushing can be used to supplement, not supplant other larger scale wildfire mitigation activities.
- b. Some of the constraints listed in part a) are quantified through workload resource planning which evaluates the resources required across the year based on the expected schedule. There is significant variation during the course of a year due to the various constraints listed in part a) including some that are not directly in SCE's control but can impact work scope and schedule that requires SCE to adjust plans accordingly.
- c. During monthly performance review meetings, management teams review potential constraints and adjust scope and schedule to reprioritize work and reallocate resources. The constraints and how they were used in reprioritization and reallocation are part of the in-depth discussions and it was not customary to document them, primarily because 2019 was the first full year of implementing the 2019 WMP and management was simultaneously focused on setting up the appropriate operational process, identifying challenges and constraints (including lessons learned from emergent events such as PSPS), and executing to meet or exceed the wildfire mitigation activity targets. SCE is in the process of further formalizing the decision-making processes this year for identifying and incorporating constraints and making tradeoffs.