

*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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**Job Title: Senior Manager, Compliance**

**Received Date: 3/5/2020**

**Response Date: 3/9/2020**

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**Question 011:**

Re. routine vegetation management (VM) in Tier 2 and Tier 3 areas (see WMP, pp. 5-104 to 5-105) :

- a. Does SCE direct its contractors to trim to 12 feet in Tiers 2 and 3 as part of its annual routine VM for conductor under 72 kV?
  - i. If no, please explain what clearances are used.
  - ii. Re. p. 5-105. Please explain what “operational constraints” might make 12-foot clearance not “achievable.” Please provide any data for 2019 discussing what percentage of trees in Tiers 2 and 3 were trimmed to 12 feet, and what percentage were trimmed to less than 12 feet.
  - iii. If yes, please explain whether this is a compliance obligation, or a discretionary choice. If discretionary, please explain why SCE has adopted this clearance distance for routine VM.
  - iv. If the clearance distance goal is less than 12 feet for routine VM in Tiers 2 and 3, please explain why SCE has not adopted a 12-foot clearance for routine VM in Tiers 2 and 3?
- b. What clearance distance does SCE direct its contractors to trim to in its Routine VM in non-HFTD areas for conductor less than 72 kV.
- c. Is it correct SCE trims all trees in Tiers 2 and 3 on an annual basis in its routine VM?

**Response to Question 011:**

a. Yes, 12 feet in Tier 2 and Tier 3, when achievable. Note: Grid Resiliency Clearance Distance (GRCD) is SCE’s terminology for expanded clearance, i.e., 12 feet in Distribution HFRA.

- I. N/A
- II. Operational constraints that might prevent the 12-foot clearance being achieved include, but is not be limited to: Customer denied GRCD, pending customer permission, agency constraint, tree condition constraint, site condition / environmental constraint, crew equipment constraint, UVM exception tree (e.g., Oaks, Conifers, and Historic – lower risk due to typically slow growth rates), and PRC exemption tree (Major Woody Stem).

SCE implemented expanded clearances in its distribution areas in June 2019. Between June 1 and December 31, 2019, SCE completed 124,115 trims, of which 70,827 (57%) met 12 feet or greater, and 53,288 (43%) did not achieve 12 feet of clearance.

- III. Achieving the 12-foot expanded clearance is not a compliance obligation but intended to follow the Commission’s recommendation per D.17-12-024 and provide greater assurance of no contact from vegetation growth.

IV. N/A

b. For Non-HFRA, SCE directs its contractors to obtain 6 feet clearance, when achievable.

c. No. All trees in SCE's vegetation inventory are inspected annually and only trimmed when required to achieve the necessary clearance.