

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 4 R e v i s e d

To: TURN

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Job Title: Senior Manager, Compliance

Received Date: 3/30/2020

Response Date: 4/3/2020

Question 001:

Re. the HTMP: In the WMP (Sec. 5.3.5.16.1), filed on 2/7/20, SCE states that it forecasts assessing 75,000 trees.

- a. How many trees does SCE forecast removing each year 2020-2022. Please explain the basis for the forecast, including at a minimum the assumed failure rate, and provide any workpapers if necessary.
- b. In the GRC submitted August, 2019, SCE stated it would assess a minimum of 125,000 trees and “upwards of 250,000 trees,” and forecasts removing an average of 15,000 trees in 2020 and an average of 20,000 trees per year in 2020-2022 (A.19-08-013, Exh. SCE-06V2, p. 37). Please explain any discrepancy in the tree removal forecasts for WMP and GRC.
- c. Please clarify SCE’s most current estimate of annual HTMP tree removals for 2020-2023.
- d. If the WMP estimate is different and more current, does SCE intend to amend its GRC testimony regarding the scope of HTMP tree removal work? If yes, when? If no, why not?

Response to Question 001:

- a. Consistent with its GRC forecast, SCE forecasts removing an average of 20,000 trees each year under its HTMP.

SCE’s assumed failure rate is between 5% to 12%. This failure rate is aligned with pilot HTMP studies and was validated in 2019 when SCE identified 16,078 trees for mitigation from 129,485 assessments. ($16,078 \div 129.485 = 12.4\%$). SCE identified 75,000 assessments as its annual compliance goal in its 2020-2022 WMP, but forecasts that it will complete an average of 167,000 assessments each year. The actual number of assessments may vary each year due to resource availability and other operational considerations. SCE also identified 10,161 trees for mitigation in 2019 that it was unable to mitigate due to operational and permitting constraints. SCE will strive to mitigate those trees in 2020. As a result, some number of trees identified for mitigation in 2020 will

likely be mitigated in 2021, and trees identified in 2021 mitigated in 2022.

b. Please see SCE's response to part (a) of this data request.

c. Please see SCE's response to part (a) of this data request.

d. As mentioned in part (a), the forecast in the WMP is the compliance goal SCE set for tree assessments. SCE is endeavoring to perform the necessary number of assessments to meet the HTMP tree removals forecast in the GRC. Therefore, the GRC forecasts for HTMP tree removals are not inconsistent with the tree assessment minimum goal proposed in SCE's WMP. Further, based on its experience in 2020, SCE may adjust its WMP goals related to this mitigation in subsequent updates or iterations as conditions evolve in the coming year. Some differences between the GRC and the WMP may result. Adoption of SCE's proposal for a two-way balancing account for wildfire mitigation and vegetation management activities is advisable to address this potential misalignment.