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 W S D - S C E - 0 0 2

To: WSD
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Received Date: 3/5/2020

Response Date: 3/10/2020

Question 105 (SCE-43895-G-280):
A. Item Index [For CPUC tracking purposes. Please reference this item index with the response provided.]
SCE-43895-G-280
B. Request Type
Request for additional specificity or clarification regarding information submitted in WMP or maturity survey
C. Relevant section of WMP (if applicable)
5.3.3
D. Relevant question in Maturity Survey (if applicable)
NA
E. Relevant meeting or call (if applicable)
NA
F. Specific Data request
How does SCE evaluate the potential for one or more grid design and system hardening projects to mitigate wildfire risk at a specific grid location? What is the methodology that is used to compare and contrast (feasiblity, viability, cost) different technologies used in isolation or in combination with others? How does SCE evaluate the avoided cost and need of existing programs (e.g. vegetation management) if a specific technology or group of technologies are deployed? What data will be collected and how will it be analyzed to determine optimal solutions that may entail deployment of one or more technologies?

Response to Question 105 (SCE-43895-G-280):
SCE uses its construction standards, equipment specifications, engineering judgment, and risk modeling (including cost and risk spend efficiency) to evaluate what, when, and where to deploy its wildfire mitigation activities. SCE also takes resource availability (e.g., planners, electrical crews, etc.) and timing of deployment into consideration when deciding mitigation options. SCE has determined that the majority of its wildfire mitigation activities are mutually exclusive, that is, each independently reduces wildfire risk, and should be deployed on a risk-informed basis specific to the mitigation benefits of each technology. For example, expulsion fuses should be replaced with non-expulsion fuses whether or not covered conductor is present in the same location because each technology independently reduces wildfire risk. One exception to this is undergrounding. SCE is considering where covered conductor is deployed or planned, and will take steps to avoid undergrounding lines that have already been covered. Conversely, if undergrounding is deemed to

be appropriate to reduce mitigation risk or PSPS impacts despite its cost and longer timelines for deployment, SCE may elect to not deploy covered conductors in those locations. Another case where SCE compares different technologies is when pole replacements are required in HFRA. In such cases, SCE evaluates whether to use a fire wrap pole or a composite pole. Both are fire resistant, but fire wrap poles cost less and therefore have a higher RSE (criteria for fire wrap pole: no equipment on pole that could cause an ignition or a woodpecker area). Thus, SCE uses fire wrap poles as replacement poles in HFRA when both of these criteria applies for a pole, but we will use the composite pole when one of these criteria does not apply and therefore the probability of ignition is higher for that pole. The composite pole will help mitigate the elevated fire risk compared to a fire-wrap pole in that situation. Existing programs, like vegetation management, generally cannot be avoided unless the lines are removed or placed underground due to compliance requirements and risk. SCE expects vegetation management to continue, and it must continue unless GO 95 Rule 35 is revised to permit a different clearance distance in proximity to covered conductor. In addition, covered conductor does not fully protect against large limb and hazard tree fall-ins, thus the hazard tree program will need to remain in place. SCE will continue to collect data on ignitions, faults that could lead to ignition, and vegetation management statistics to model the relationship between vegetation and covered conductor.