

*Southern California Edison*  
*2023-WMPs – 2023-WMPs*

**DATA REQUEST SET T U R N - S C E - 0 0 5**

**To: TURN**  
**Prepared by: Hunly Chy**  
**Job Title: Senior Manager**  
**Received Date: 5/5/2023**

**Response Date: 5/10/2023**

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**Question 03:**

Following up on the response to TURN DR 2-4:

- a. Please identify and describe the circumstances under which SCE will not underground secondary distribution lines in 2024-2025, including but not limited to an explanation of the circumstances when this would not be feasible.
- b. Please provide SCE's best estimate (which may be a rough approximation, if that is the best estimate) of the percentage of undergrounding projects in 2024-2025 in which secondary lines will not be undergrounded.
- c. Please confirm, per SCE's response to TURN DR 2-6(b), that SCE does not intend to underground any secondary lines in its 2023 undergrounding projects. If this is not correct, please explain the response.

**Response to Question 03:**

- a. The main reason SCE may not underground secondary lines is if SCE cannot obtain easements (e.g., property owner does not approve or a governmental agency does not approve needed permits). In addition, similar to undergrounding of primary lines, secondary lines may not be undergrounded if it is determined infeasible due to the specific terrain (e.g., large boulders, locations where undergrounding construction equipment cannot access, etc.), or due to existing utilities/infrastructures that cannot be relocated or the underground lines cannot be re-routed to avoid other utilities (e.g., water, gas, sewer, electrical lines, railroad track, etc.). These only represent some potential reasons why SCE would not be able to underground secondary lines.
- b. SCE is in the preliminary stages of designing/planning the scope of work for 2024 – 2025. SCE intends that all secondary lines that run along the same path or are attached to the targeted primary conductor undergrounding scope will be designed to be underground, where feasible. The feasibility of the secondary scope will be determined during rights acquisition or during construction which has not begun.
- c. That is correct. As additional context, the scope of work for 2023 projects was developed prior to SCE's analysis of secondary ignitions in 2022. Because of the timeline required for underground project development, SCE is not re-designing the 2023 scope to include secondaries as part of the targeted undergrounding scope. Instead, SCE will remediate secondary conductor risks associated with those lines using other methods.