
July 5, 2019

ADVICE 4030-E
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Southern California Edison Company's Wildfire Mitigation Work Outside of the Commission's High Fire Threat District During the 2019 Wildfire Mitigation Plan Year

In compliance with Decision (D.)19-05-038, Southern California Edison Company (SCE) hereby lists its wildfire mitigation work that it has completed, plans to complete, and may do during the 2019 Wildfire Mitigation Plan (WMP) year in high fire risk areas (HFRA) outside the California Public Utilities Commission (CPUC or Commission) High Fire Threat District (HFTD) map.

PURPOSE

This advice letter provides the Commission with a list of SCE's wildfire mitigation work during the 2019 WMP year that has been completed, will be completed or may be completed in HFRA outside of the Commission's HFTD as required by Ordering Paragraph (OP) 2 of D.19-05-038.

BACKGROUND

In D.17-12-024, the Commission adopted new fire-safety regulations requiring investor-owned utilities (IOUs) to integrate into their operations a new HFTD map, indicating areas in California that are affected by Tree Mortality High Hazard Zones (Zone 1) or represent an elevated (Tier 2) or extreme (Tier 3) wildfire risk due to utility infrastructure-associated ignitions.¹ These tier designations drive certain maintenance, inspection, and vegetation management criteria/inspection intervals of overhead assets in high fire-threat areas. Prior to the creation of the CPUC HFTD, SCE utilized multiple sources to specify which areas in its service area historically represented high fire risk.

¹ The Final CPUC HFTD Map was published on January 5, 2018 in the Pacific Gas and Electric Company, San Diego Gas & Electric Company, and REAX Engineering joint Advice Letter 5211-E / 3172-E and adopted by the Commission on January 19, 2018 via Safety and Enforcement Division's (SED) disposition of the aforementioned joint Tier 1 Advice Letter.

Since D.17-12-024, SCE maintained HFRA that was a combination of its historical map boundaries (based on past fire management and response experiences), CAL FIRE's Fire Hazard Severity b Zone (FHSZ) maps, and most recently, the CPUC HFTD map. SCE has considered all four categories (i.e., Zone 1, Tier 2, Tier 3, and non-CPUC historical high fire risk areas) to be "HFRA." As shown in Table 3-5 of SCE's 2019 WMP, approximately 4,200 square miles of SCE's service territory (or approximately 8 percent) consisted of non-CPUC HFRA.²

In the fall of 2018, a team consisting of SCE employees with subject matter expertise in fire management/response, fire behavior/fuels, meteorology, maintenance/inspection, grid operations, vegetation management, and geospatial analysis embarked on a project to evaluate these non-CPUC HFRA (divided geospatially into over approximately 1,000 space areas or "polygons"). SCE is nearing the completion of this review. Once the final review has been completed, SCE plans to operationalize and treat the retained non-CPUC HFRA as Tier 2 (elevated) fire threat until the CPUC formally adopts these areas (and/or parts of these areas and/or other removed non-CPUC HFRA) into the HFTD Tier 2 and Tier 3 designations.³

SCE'S WILDFIRE MITIGATION WORK DURING THE 2019 WMP YEAR IN SCE'S NON-CPUC HFRA BUT OUTSIDE THE COMMISSION'S HFTD

In D.19-05-038, the Commission approved SCE's 2019 WMP and directed SCE to comply with the reporting, metrics, advice letter, and other follow-up requirements set forth therein. One of the requirements was for SCE to provide a list of any wildfire mitigation work SCE plans on undertaking during the effective dates of the 2019 WMP in SCE's non-CPUC HFRA but not in the HFTD.

Below, SCE lists and describes its wildfire mitigation work that has already been completed, will be completed, or could take place in its non-CPUC HFRA but outside the Commission's HFTD during the 2019 WMP year. SCE provides a description of this work below aligned to its 2019 WMP activities. Several activities in the 2019 WMP are not based on their location in HFRA, such as SCE's Expansion of Risk Analysis (RA-1), Wildfire Infrastructure Protection Team Additional Staffing (OP-2), and Emergency Responder Training (DEP-2), and these activities are not discussed below. SCE also briefly describes location-based activities that it does not plan to undertake in non-CPUC HFRA, with an explanation that no such relevant work will be done in non-CPUC HFRA in 2019. As explained above, SCE is nearing the completion of its evaluation of its non-CPUC HFRA and is in process of operationalizing the removal of the vast majority of these areas from SCE's HFRA. Additionally, given that some of its wildfire

² SCE also operates and maintains electrical infrastructure outside its service area that included approximately 4,500 square miles previously designated as non-CPUC HFRA.

³ At this time, SCE anticipates filing a petition to modify D.17-12-024 to request formal inclusion of SCE's retained non-CPUC HFRA into the HFTD.

risk mitigation programs are situational and based on real-world events such as Red Flag Warnings (RFW) and other high fire-risk conditions, SCE has also included a few wildfire mitigation activities that could be triggered in SCE's retained non-CPUC HFRA during the 2019 WMP year.

ANNUAL SOB 322 REVIEW (OP-1) (i.e., SCE internal procedures and operating practices in HFRA)

As described in Chapter 4.1 of its 2019 WMP, SCE employs several operating practices to reduce potential ignitions during extreme weather conditions. These operating practices are contained within SCE's Standard Operating Bulletin (SOB) 322. As described in the 2019 WMP, these include practices such as displaying Red Flag Fire patrol signs on utility vehicles, limiting work in HFRA, setting all distribution-related circuit breakers and reclosers protecting portions of circuits that traverse HFRA to not automatically re-energize, and not re-energizing lines until they have been patrolled where protective relays on circuit breakers have interrupted the flow of electricity when the National Weather Service (NWS) has issued a RFW or during other elevated fire-risk conditions (i.e., those specifically determined by SCE's in-house subject matter experts based on local weather conditions). SCE has operated its system using SOB 322 in all HFRA during 2019, including its HFRA areas outside the CPUC HFTD. Once SCE completes its final review and operationalizes the removal of the majority of its previous non-CPUC HFRA, only the HFTD and those retained non-CPUC HFRA will continue to be included in SOB 322. SCE anticipates that through the duration of 2019 there will be several RFWs issued and other elevated fire-risk weather that will trigger SOB 322. SOB 322 will be updated to reflect changes to SCE's non-CPUC HFRA described previously.

DISTRIBUTION ENHANCED OVERHEAD INSPECTIONS (IN-1)

As part of SCE's Enhanced Overhead Inspection (EOI) initiative, described in Section 4.2 of its 2019 WMP, ground-based inspections were completed on approximately 94,000 structures identified as being in non-CPUC HFRA. SCE has completed nearly all of its planned 2019 ground-based EOI and the very few remaining (due to inaccessibility issues) are within the HFTD. Based on the assessments performed during those inspections, issues requiring repairs were found on approximately 10,000 of those structures. Notifications were generated for these structures with remediation timeframes consistent with SCE's regular maintenance and inspection process (with acceleration when appropriate). Given that Priority 1 timeframes are relatively short, the vast majority of these notifications have already been corrected. Of the remaining structures left to remediate, the remediation is split between O&M repair work (e.g., crossarm replacements, insulator replacements, vegetation trims, etc.) and Capital repair work (e.g., transformer replacements, pole replacements, conductor replacements, etc.). Priority 2 issues have up to 12 months to remediate within HFTD and SCE will be remediating these throughout 2019 and some may trail into 2020 and beyond. Currently, approximately 400 structures are still in-scope for remediation in

2019. Priority 2 issues on structures in areas that are being removed from the non-CPUC HFRA will no longer be subject to the expedited timeframe for remediations that are required by regulation for HFTD Tier 2.

SCE has also recently initiated an aerial EOI effort for its distribution assets, which will include both HFTD and retained non-CPUC HFRA areas in 2019.

TRANSMISSION ENHANCED OVERHEAD INSPECTIONS (IN-2)

Transmission conducted over 50,000 ground-based EOI of structures in HFRA (including non-CPUC HFRA). Inspections of all these structures started in December 2018 and continued through May 2019. These inspections took into consideration a risk-based approach compared to SCE's historical compliance-based inspection practices. Although inspections in the past required detailed assessments, the inspectors were directed to focus on potential ignition sources. As such, all transmission structures were inspected with new criteria that was defined in a checklist. Inspections of all structures and remediation of Priority 1 issues have already been completed in HFTD and non-CPUC HFRA. Approximately 12,000 structures inspected were located in non-CPUC HFRA. For lower-risk notifications found in HFRA, SCE has focused its remediation prioritization in HFTD Tier 3 and Tier 2 areas. For the approximately 3,000 lower-risk notifications found in non-CPUC HFRA, SCE will remediate those issues on expedited timeframes when it is efficient to do so. In other cases, those issues will be remediated pursuant to the standard compliance timeframe. Some of these lower-risk notifications will be completed in 2019 and continue into 2020 and potentially beyond for those notifications that fall within areas of non-CPUC HFRA.

Aerial EOI of structures is also currently taking place and will continue to take place beyond 2019. Aerial inspections are an enhanced version of Transmission's aerial line patrols. Historically, not every area received an aerial patrol. These enhanced aerial inspections offer a more comprehensive view of the pole top, the wooden crossarms, the steel structures, and all conductor/hardware. The enhanced aerial inspections are performed by drone or helicopter and have identified additional issues that could not be or were not identified from ground-based EOI. In an aerial EOI, every pole/tower will have an HD video available along with individual still frames (photos) of each connection point on the pole or tower. Inspectors and other transmission personnel are then able to review the videos and images to further assess the structures and identify issues that need to be remediated.

GENERATION ENHANCED OVERHEAD INSPECTIONS

Generation EOI have been completed on 13 facilities in non-CPUC HFRA in 2019. Five additional generation facilities in non-CPUC HFRA are planned to have EOI completed in 2019. Based on the results of this EOI effort to date, issues requiring remediation were found on only two of these facilities, which are currently in the planning process. Timing of remediation work stemming from these EOI will follow the same practices

outlined for transmission and distribution EOI described above (based on priority and location).

QUALITY OVERSIGHT / QUALITY CONTROL OF EOI (IN-3)

As described in its 2019 WMP, SCE performs independent quality control (QC) inspections on transmission and distribution infrastructure, which include QC inspections of facilities within SCE's non-CPUC HFRA. As of June 14, 2019, SCE performed 882 QC inspections of distribution and transmission facilities located within SCE's non-CPUC HFRA. The vast majority (~90%) of these QC inspections were conducted on distribution infrastructure. Going forward in 2019, SCE plans to conduct approximately 120 additional QC inspections of distribution and transmission facilities located within SCE's retained non-CPUC HFRA as SCE continues to also perform QC inspections on its facilities in the HFTD.

DISTRIBUTION INFRARED INSPECTIONS (IN-4)

SCE will only be conducting infrared scanning in HFTD Tier 2 and Tier 3 areas for distribution facilities and has eliminated non-CPUC HFRA locations from its infrared scanning scope in 2019.

TRANSMISSION INFRARED INSPECTIONS, CORONA SCANNING AND HIGH DEFINITION IMAGERY (IN-5)

Infrared (IR) and ultraviolet (Corona) scanning of the lines are also new technologies that SCE has adopted to determine if temperature differences in some components (splices, conductors, etc.) could be an early sign of failure. Electric discharge that would typically be found through a Corona scan could also detect potential mechanical or component failure. High Definition (HD) imagery of these anomalies are taken to identify specific potential problem areas on these facilities. SCE has treated non-CPUC HFRA areas the same as HFTD and is therefore performing IR and Corona inspections of all structures in non-CPUC HFRA. Inspections of approximately 12,000 structures in non-CPUC HFRA are expected to be completed in 2019. Similar to ground-based EOI, remediation of Priority 1 issues have already been completed in HFTD and non-CPUC HFRA. Priority 2 and 3 notifications found in non-CPUC HFRA will be remediated on expedited timeframes when it is efficient to do so. SCE plans to continue using these tools to inspect the approximately 50,000 structures in HFRA on a going-forward basis, given that anomalies identified are not visible to the human eye and therefore are a valuable complement to the EOI initiative.

COVERED CONDUCTOR (SH-1)

SCE's Wildfire Covered Conductor Program (WCCP) deployment in 2019 is largely based on the original prioritization methodology presented in its GSRP filing where 40 percent of the weighting is based on the length of circuitry within Tier 2 and Tier 3.

Accordingly, the vast majority of covered conductor will be installed within the HFTD. SCE estimates that by the end of 2019 and since it began the program in 2018, approximately three (3) circuit miles of covered conductor will have been installed outside of the CPUC's HFTD as part of the WCCP. SCE anticipates that as part of its WCCP, it will have installed approximately 380 circuit miles of covered conductor since inception and through 2019.

Additionally, SCE revised its distribution design standards in mid-2018 calling for all new conductor within SCE's HFRA, which includes areas outside of the HFTD, to be covered conductor. This is applicable to new business and all existing capital programs in addition to WCCP. Therefore, projects that were designed after the mid-2018 standards update and constructed in 2019 will add to the total amount of covered conductor installed and may include an additional small percentage of covered conductor outside of the HFTD.

COMPOSITE POLES AND CROSS ARMS (SH-3)

Due to a limited supply of fire-resistant composite poles, SCE has prioritized their installation on a handful of WCCP circuits and does not anticipate any 2019 installations outside the CPUC's HFTD. This strategy is intended to maximize their resiliency benefits by placing them in the higher-risk areas in proximity to other fire-resistant poles so if a fire were to burn through the area there would be a sufficient number of poles that remain standing so as to keep the conductor in the air, minimize the occurrence of fallen poles blocking evacuation routes during a wildfire event, and facilitate a more rapid service restoration post-fire. For the limited amount of covered conductor installed in non-CPUC HFRA through 2019, required pole replacements will likely be with standard wood poles or fire-resistant wrapped wood poles.

Composite cross arms, on the other hand, have been made standard throughout SCE's entire service territory and will be comprehensively deployed outside of the HFTD. SCE is currently in the process of using existing inventory of wood cross arms for installation outside the HFTD and transitioning to composite arms for all work going forward.

BRANCH LINE PROTECTION STRATEGY (SH-4)

SCE's branch line protection strategy is intended to be deployed across SCE's HFRA (which is inclusive of the HFTD and SCE's non-CPUC HFRA) to reduce fault energy on branch lines by installing an overcurrent protective device generally where radial branch lines transition from the main line circuitry. This program will primarily be focused on installing Current Limiting Fuses (CLFs), but may install either conventional fuses or single phase reclosers to achieve the greatest reduction for a given situation.

SCE is executing this line protection strategy geographically with a small number of dedicated contract line crews to optimize efficiency by reducing travel times and increased productivity. The 2019 WMP target is to install overcurrent protective devices

at no fewer than 8,511 HFRA locations that do not already have overcurrent protective devices. It is estimated that the number installed outside of the HFTD will be approximately 20 percent, which is proportionate to the percentage of SCE's HFRA that is outside of the CPUC's HFTD.

REMOTE CONTROLLED AUTOMATIC RECLOSERS INSTALLATIONS (SH-5)

The intent of the installing Remote Automatic Reclosers (RARs) is to provide reclose blocking, fast curve protective settings, and an automated means to sectionalize circuitry at SCE's HFRA boundaries. In order to provide this functionality, SCE is installing RARs just outside the HFRA boundaries to ensure that all conductors within the boundary are protected. The RARs that have and will be installed in 2019 all protect circuitry within the HFTD and/or non-CPUC HFRA.

REMOTE CONTROLLED AUTOMATIC RECLOSERS SETTING UPDATES (SH-6)

RAR relay setting updates include configuration changes which allow SCE to remotely toggle the device settings to operate faster for many faulted conditions, limiting total energy delivered to these faults and reducing ignition risks. As explained above, RARs are typically located immediately outside of the classified area, whether the area is in the HFTD or non-CPUC HFRA designation to allow for complete circuitry coverage which extends into the classified area(s) with the operational features provided by the device. The circuitry beyond an RAR often extends for miles where the circuitry can traverse HFTD, non-CPUC HFRA, and non-HFRA.

SCE has completed setting updates for approximately 90 percent of the 150 RAR installations targeted in its 2019 WMP. SCE anticipates approximately 20 percent of the total targeted 150 RAR applications will be completed on RARs where the related circuitry does not transverse HFTD areas. SCE does not expect to exceed the projected 2019 WMP target of 150 RAR setting update installations by any substantial amount.

CIRCUIT BREAKER FAST CURVE SETTINGS (SH-7)

Circuit Breaker (CB) relay setting updates include configuration changes which allows SCE to control these devices to operate faster for many faulted conditions, limiting total energy delivered to these faults and reducing ignition risks. The circuitry beyond a CB often extends for miles where the circuitry can traverse HFTD, non-CPUC HFRA, and non-HFRA.

In 2019, SCE updated 10 CB relays with fast curve operating settings for HFTD applications and an additional three CB relays were updated on circuits which only traverse recently removed non-CPUC HFRA circuitry or unclassified areas. SCE is currently finalizing plans for remaining fast curve setting updates in 2019 and anticipates the quantities to be minimal through the end of this year.

HAZARD TREE MITIGATION PROGRAM (VM-1)

In 2019, Hazard Tree assessments and remediation are only planned to be performed within the HFTD.

EXPANDED POLE BRUSHING (VM-2)

In 2019, pole brushing is being performed within the HFTD and State Responsibility Areas required by Public Resource Code (PRC) 4292.

EXPANDED CLEARANCE DISTANCES AT TIME OF MAINTENANCE (VM-3)

In 2019, expanded clearance distances are only being performed within the HFTD consistent with the recommendations of General Order (GO) 95 Rule 35 Appendix E.

DRI QUARTERLY INSPECTIONS AND REMOVALS (VM-4)

Drought Relief Initiative (DRI) is performed within the HFTD Tier 2 and Tier 3 areas and extends into non-CPUC HFRA.

LIDAR INSPECTIONS OF TRANSMISSION (VM-5)

In 2019, SCE is planning to LiDAR approximately 4,600 transmission circuit miles, of which approximately 1,000 circuit miles will be contained within the HFTD. Additionally, approximately 200 – 300 of the 4,600 circuit miles are located in non-CPUC HFRA. The 4,600 LiDAR circuit miles are focused on WECC/ISO circuits where SCE has existing “known” vegetation inventory, and one of the purposes of the LiDAR is to obtain a baseline survey across all of SCE’s transmission lines.

WEATHER STATIONS (SA-1)

SCE is prioritizing the installation of weather stations in the HFTD, with well over 90 percent of the stations installed or planned within the HFTD. Siting weather stations includes the following factors: high wind areas, high fire areas, elevation, and lack of quality observations amongst others.

Due to the irregular shape of the HFTD and irregular shape of circuits, some circuits have portions of the circuit within the HFTD and other portions of the circuit outside the HFTD areas. In some cases, the portion of the circuit within the HFRA will have unsuitable poles for installation of weather stations (e.g., inadequate cellular coverage, congestion on poles, inaccessible location for bucket truck access, etc.). In these cases, weather stations have been installed outside of the HFTD to enable a circuit to have a weather station and maintain situational awareness.

Input from adjacent National Weather Service (NWS) Offices and their fire meteorologists is also considered when siting weather stations. Some locations sited by NWS meteorologists include areas just outside HFRA and were installed to capture a variety of fire weather concerns. Capturing weather conditions for all types of fire weather will help with future weather modeling improvements by SCE and others.

HD CAMERAS (SA-3)

The AlertWildfire contract requires UCSD to achieve up to 90 percent coverage of HFTD Tier 2 and Tier 3 areas by the end of 2020. Camera locations are selected in coordination with UCSD, local and state fire agencies as well as SCE fire management, with an overarching goal of maximizing view shed coverage in the HFTD Tier 2 and Tier 3 areas. In some instances, cameras needed to be placed outside of the HFTD Tier 2 and Tier 3 areas in order to enhance view shed coverage of the Tier 2 and Tier 3 areas in rugged terrain.

DE-ENERGIZATION NOTIFICATIONS (PSPS-1)

In 2019, SCE activated an Incident Management Team (IMT) on two occasions, from December 31, 2018 through January 1, 2019 and another from June 18, 2019 to June 21, 2019. Notifications were made to customers in HFTD, non-CPUC HFRA, as well as customers that were not in HFRA as many distribution circuits cross through HFTD, non-CPUC HFRA, and non-HFRA areas. In areas where a circuit is not fully contained within HFRA, SCE typically has isolating devices that are designed to minimize the impact to non-HFRA customers. However, at times a circuit breaker may need to be opened to facilitate operating the isolating device to mitigate ignition risk. In these cases, the initial outage may include non-HFRA customers, and therefore as a precautionary measure all customers on the impacted circuits are notified.

As described in its Public Safety Power Shutoff (PSPS) protocols and 2019 WMP, SCE will de-energize a circuit in HFTD and non-CPUC HFRA when weather conditions pose an imminent and significant threat to public safety associated with wildfire risk. Circuit de-energization can also include subtransmission and transmission lines. As such, it is possible that the de-energization of a subtransmission or transmission line could affect downstream distribution circuits not in the CPUC HFTD, SCE's retained non-CPUC HFRA, and even non-HFRA.

SCE anticipates it will notice customers within the HFTD, non-CPUC HFRA and non-HFRA throughout 2019 as RFW and other elevated fire risk weather events occur as part of its PSPS protocols.

ALTERNATIVE TECHNOLOGY PILOTS (AT-1)

The Cal Fire-exempt surge arrester installation pilots are not specifically targeted for HFTD or non-CPUC HFRA installations. The pilot installations are intended to ensure

fitment in a collection of installation applications where surge arresters are installed. The change to SCE's non-CPUC HFRA is not expected to impact the pilot evaluation efforts.

Meter Alarming for Downed Energized Conductors (MADEC) is also not impacted by the non-CPUC HFRA changes. The MADEC system is a machine learning software system that uses existing SCE Smart Meter data to detect energized down conductors assisting with improving public safety hazards with down energized conductors, and reducing ignition risks with down wires. SCE Smart Meters, which provide the data for analysis, are applied across the service territory including the HFTD areas.

GSRP WILDFIRE MITIGATION PROGRAM STUDY (AT-2)

SCE plans to install 60 Distribution Fault Anticipation (DFA) devices in seven substations. Two of the seven substations and four of the 60 circuits are located within the non-CPUC HFRA. All other substations and circuits that the DFAs will be monitoring traverse through portions of the HFTD Tier 2 and Tier 3 areas.

ALTERNATIVE TECHNOLOGY EVALUATIONS (AT-3)

As of early May 2019, SCE has initiated efforts to evaluate and establish equipment and installation design feasibility for substation class electronic fuses (Substation CLF). This technology is based on existing current limiting fuse theory but is designed to further expand the applicability of this technology by providing increased continuous current ratings. Along the same principle of Branch Line Protection Strategy, the substation class CLF is intended to abruptly limit short-circuit current magnitude and duration to further reduce the risk of an ignition.

SCE is evaluating various vendors to determine the solution that best suits SCE's intended application and ability to universally apply amongst circuits within the HFTD and retained non-CPUC HFRA. In parallel, efforts are underway to determine the pilot installation location of ten additional locations (total eleven sites) with an anticipated installation and in-service date by the end of Q4 2020. The additional ten location installations are intended to aide in the evaluation of the technology under various conditions to help SCE refine and further dial in the criteria/settings associated with the equipment, the application, and its implementation. Due to the resources required to replace the "blown" active part of the unit, it may require the selection of circuits that do not fall within the HFTD map to allow for SCE to respond in a more timely manner. In addition, because these units are installed within or in close proximity of the substation, the selected site may not be within the HFTD, but the circuit may traverse the HFTD at some distance away from the substation.

CUSTOMER EDUCATION AND ENGAGEMENT (DEP-1)

SCE has scheduled eight community meetings, seven of which will include outreach to customers in non-CPUC HFRA. These seven include the following areas:

- Yucca Valley
- Coachella Valley
- Tulare
- Mono County
- Victorville
- Culver City
- Ventura

Notwithstanding the outreach described above, SCE is not planning to host any community meetings in non-CPUC HFRA and is in the process of sending letters to all customers in HFRA outlining its WMP, PSPS process, and preparedness tips. SCE will continue to inform and educate all customers throughout its service territory through other channels including the statewide PSPS campaign (described below), SCE-specific PSPS education campaigns, messaging on sce.com, social media, and its media relations efforts.

In 2019, SCE plans to meet with City and County staff in all HFTD and retained non-CPUC HFRA and present at as many as possible City Council and County Board of Supervisors meetings in these areas to discuss its WMP and PSPS. In addition, SCE will conduct similar meetings and discussions with business organizations, community-based organizations and government associations in these same areas this year.

SCE continues to partner with the other IOUs, Cal OES and the CPUC on a statewide advertising campaign around PSPS. SCE recently launched radio advertising, as well as search engine word and digital banner ad campaigns throughout its service territory that reach all customers. These campaigns and additional campaigns are expected to last through November 2019.

No cost information is required for this advice letter.

This advice letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

TIER DESIGNATION

Pursuant to OP 2 of D.19-05-038, this advice letter is submitted with a Tier 1 designation.

EFFECTIVE DATE

This advice letter will become effective on July 5, 2019, the same day as submitted.

NOTICE

Anyone wishing to protest this advice letter may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice letter. Protests should be submitted to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone: (626) 302-9645
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Laura Genao
Managing Director, State Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B and Rulemaking (R.)18-10-007 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-3719. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping the advice letter at SCE's corporate headquarters. To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Ryan Stevenson at (626) 302-3613 or by electronic mail at ryan.stevenson@sce.com.

Southern California Edison Company

/s/ Gary A. Stern, Ph.D.
Gary A. Stern, Ph.D.

GAS:rs/kc:jm



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	