

June 3, 2021

Caroline Thomas Jacobs, Director
Wildfire Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

SUBJECT: Southern California Edison's Revised 2021 Wildfire Mitigation Plan Update Pursuant to the Wildfire Safety Division's Revision Notice

Director Thomas Jacobs,

Southern California Edison Company (SCE) is submitting a revised 2021 Wildfire Mitigation Plan Update (Revised WMP) pursuant to the May 4, 2021 Wildfire Safety Division's (WSD) Revision Notice.¹ SCE's Revised WMP responds to the four Critical Issues, the remedies sought, and includes other revisions that were documented during the discovery period.

OVERVIEW

SCE appreciates the WSD issuing the Revision Notice as part of its review of SCE's 2021 WMP Update. SCE generally agrees that the additional information and remedies sought will further aid WSD's review in its disposition on SCE's 2021 WMP Update. SCE's responses to Critical Issues SCE-01, SCE-02, and SCE-03 are wholly included in new appendices 9.8, 9.9, and 9.10, respectively.² SCE's response to Critical Issue SCE-04 is integrated into Chapter 8 and includes some revisions in certain Chapter 7 sections that have overlapping mitigations with SCE's PSPS Corrective Action Plan (Action Plan). SCE also includes its Action Plan in Appendix 9.11.³ For revisions made due to the Revision Notice, the redlined version includes additions indicated by red underlined text and deleted text indicated by red strikethrough. For the other revisions documented during the discovery phase, the redline version includes additions indicated by blue underlined text and deleted text indicated by blue strikethrough (see table below for a list of these revisions). Each of SCE's responses to the four Critical Issues are comprehensive and meet or exceed the required remedies. Overviews of SCE's responses to the four Critical Issues and its other revisions are below.

¹ SCE is submitting a redlined and clean version of its Revised WMP along with a clean Excel file of Tables 1-12 that includes a change log through the California Public Utilities Commission (CPUC or Commission) Kiteworks system. These documents are also available on SCE's WMP website (<https://www.sce.com/safety/wild-fire-mitigation>).

² A few tables have also been updated in Chapters 4 and 5.

³ Revision Notice at p. 13.

SCE-01: Regression of Reported Risk-Spend Efficiency Estimates for Mitigation Initiatives Compared with 2020 WMP Submission

Critical Issue SCE-01 requires SCE to identify initiatives that had Risk Spend Efficiency (RSE) estimates in its 2020 WMP but not in its 2021 WMP Update and provide “missing” RSE estimates and RSE estimates for initiatives located in Zone 1 or non-High Fire Threat District (HFTD) areas. In our response, SCE provides an overview of the Risk Spend Efficiency (RSE) differences in the 2020 WMP compared to the 2021 WMP Update and identifies additional RSEs calculated for the Revised WMP. SCE shows that the number of unique RSEs (excluding the additions for the Revised WMP) actually increased from the 2020 WMP to the 2021 WMP Update. SCE explains the changes in RSEs and provides reasons for the differences along with a description of the new RSEs included in the Revised WMP. SCE also explains that the majority of its mitigations are solely deployed in Tier 2 and Tier 3, thus very few RSEs are calculated outside of those two tiers.

SCE-02: Inadequate Alternatives Analysis

Critical Issue SCE-02 requires SCE to elaborate on its wildfire mitigation initiative decision-making process and include an example of the initiative selection procedure for certain mitigation categories. SCE’s response includes an overview of our risk-informed decision making framework with a detailed flowchart. SCE explains the specific steps and key considerations in its decision-making process. SCE then explains how this generalized decision-making process was applied to help select five particular wildfire mitigation initiatives: Distribution Fault Anticipation (DFA) for the Situational Awareness and Forecasting category, Covered Conductor for the Grid Design and System Hardening category, Distribution High-Fire Risk-Informed (HFRI) inspections for the Asset Management and Inspection category, Hazard Tree Mitigation Program (HTMP) for the Vegetation Management and Inspections category, and Customer Care Programs with a specific focus on Community Resource Centers (CRC) and Community Crew Vehicles (CCV) for the Grid Operations and Protocols category.

SCE-03: Inadequate Justification for Extensive Utilization of Covered Conductor

Critical Issue SCE-03 requires SCE to fully and adequately demonstrate why it has selected covered conductor over alternative initiatives in its decision-making process. Building off of its responses to Critical Issues SCE-01 and SCE-02, SCE provides background and an overview of our covered conductor justification. The response also details our covered conductor deployment prioritization based on highest risk circuit segments, how our deployment prioritization takes into account frequent PSPS events, how covered conductor effectiveness compares to alternatives, and how covered conductor is effective at reducing frequency and scope of PSPS events.

SCE-04: Insufficient Detail on SCE’s Public Safety Power Shut-Off Corrective Action Plan Is Included Within Its 2021 WMP Update

Critical Issue SCE-04 requires SCE, in Chapter 8, to identify and describe the relevant measures that will be updated via the Action Plan in terms of deliverables and milestones and how the Action Plan will reduce PSPS scope, scale, and frequency.

SCE’s response includes additional narrative in Chapter 8 describing the Action Plan in terms of deliverables and projected milestones and how the Action Plan will reduce PSPS scope, scale and frequency. Additionally, and because of the overlap of the Action Plan with some mitigations, we have also included revisions in certain Chapter 7 sections.

Other Revisions

Since SCE submitted its 2021 WMP Update on February 5, 2021, SCE has identified a limited number of revisions. A number of these revisions resulted from discovery requests submitted by the WSD and stakeholders that identified items in the 2021 WMP Update that required revision. None of the changes materially change the 2021 WMP Update. The table below summarizes the other revisions made to SCE’s 2021 WMP Update and for each revision includes chapter/section reference, page number, and the nature of the revision.⁴

Location of Change		Nature of Change
Chapter / Table	Page #	
Chapter 3 (Table 3-1)	32	Corrected costs for remapped mitigations in Wildfire categories (Risk Assessment & Mapping, Situational Awareness, and System Hardening)
Chapter 3 (Table 3-2)	32-33	Corrected costs for remapped mitigations in Wildfire categories (Risk Assessment & Mapping, Situational Awareness, and System Hardening)
4.3.2	56	Corrected Figure numbering
4.3.3	57-58	Corrected Figure numbering and updated WRRM Framework Figure
4.3.7, 9.5	63, 424	Provided missing acronym for serious injury (S.I.) used in the Safety Index Equation
4.3.7	64	Provided missing Safety Index Equation in the MARS section for Vulnerable / At-Risk Communities
5.2	106	Corrected Section and Figure references
5.3	113, 120	Table 5.3-1: Corrected “2019 Performance” amount of RAR/RCSs (SH-5) installed to include RCSs; Added language for “Projected Target by End of 2021” related to IN-1.2

⁴ This list does not include minor edits due to formatting changes and typographical, spelling, or grammatical errors.

Location of Change		Nature of Change
Chapter / Table	Page #	
7.3.3.8.1	221	Removed duplicate sentence
7.3.4.9.2	247	Corrected Table reference
7.3.4.10.1	250, 251	Clarification on scope for Transmission risk-informed inspections
7.3.4.10.2	250, 251	Updated “Region Prioritization” language; Corrected “Progress of Initiative” count of structures inspected (ground inspections) Table 7-3: Updated Ground Inspections “2020 Units” count and “2021 Comments” language
7.3.6.5.2.1	294-295	Clarified services provided at CRCs
7.3.6.5.2.2	296-297	Clarified information about Resiliency Zones Pilots and Customer Resiliency Equipment Incentives
7.3.6.5.2.3	300	Corrected the customer count that have redeemed the residential battery station rebate
8.1.3	351	Provided clarification on FPI
8.1.4	355 - 356	Updated estimates in Table SCE 8-1 based on finalized data
	357	Corrected number of mobile generation units for 2021 deployment
8.2.1	361	Clarified services provided at CRCs/CCVs
8.2.4	370	Clarified Medical Baseline definition and policy for contacting Critical Care customers during a PSPS
8.3	376	Corrected target for June 2021 to clarify that plans were created for circuits that were de-energized four or more times in 2020
8.5	395	Clarified PSPS thresholds
9.6	437 - 451	Revised risk-informed prioritization Table
9.6	524	Corrected Section references

SCE looks forward to the WSD's disposition of its 2021 WMP Update and welcomes a meeting to discuss our responses if the WSD would find that useful. If you have any questions, or require additional information, please contact me at michael.backstrom@sce.com.

Sincerely,

//s//

Michael A. Backstrom
Vice President, Regulatory Policy
Southern California Edison

cc: Service List for R.18-10-007
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CALFIREUtilityFireMitigationUnit@fire.ca.gov