

February 5, 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 2021 Wildfire
Mitigation Plan Update and Q4 2020 Quarterly Data
Report

Dear Director Thomas Jacobs:

Southern California Edison Company (SCE) serves notice of availability of our 2021 Wildfire Mitigation Plan (WMP) Update pursuant to Resolution WSD-011 and our Q4 2020 Quarterly Data Report (QDR) pursuant to Resolution WSD-011, Attachment 3 as modified by the Wildfire Safety Division's (WSD) January 8, 2021 Draft Compliance Operational Protocols (Draft Compliance Protocols). These documents can be found on SCE's WMP webpage (<https://www.sce.com/wmp>).

SCE is dedicated to the safety of our customers and the communities we serve. In our 2021 WMP Update, we set forth our update to the Commission-approved 2020-2022 WMP. Our 2021 WMP Update builds on the successes of our WMP implementation to date, incorporates the lessons we learned during WMP deployment and reflects the continued progress we made in our analytical, engineering and process maturity in 2020. Our 2021 WMP Update proposes:

- Additional grid hardening,
- Enhanced inspection and repair programs,
- Continuation of aggressive vegetation management,
- Increased situational awareness and response, and
- Augmented activities for Public Safety Power Shutoff (PSPS) resilience and community engagement, particularly for underrepresented groups and our access and functional needs (AFN) customers.

Our 2021 WMP Update also outlines how we have matured in our wildfire mitigation capabilities and our long-term plan to further advance our risk-informed decision-making, data management, grid hardening and community engagement before, during, and after wildfire-related events. While we have made considerable progress, we continue to look for opportunities to improve. We want to thank California's leadership — lawmakers and various agency personnel — for addressing this critically important public safety issue. We are proud of our partnership with local governments, first responders and the general public, who have come together to further reduce the risk of potentially devastating wildfires. The Executive Summary in the 2021 WMP Update provides an overview of our WMP progress, commitment to wildfire mitigation and PSPS resilience, commitment to

responding to stakeholder feedback regarding improvements to our current PSPS process, and a summary of our planned wildfire mitigation strategies and programs.

Our Q4 2020 QDR continues to include more data than previous Quarterly Reports. While we are unable to provide all requested data at this time, we are committed to providing more data and details in subsequent QDR submissions to meet the WSD's Draft GIS Data Schema requirements. SCE appreciates the WSD acknowledging how utilities are at different stages of their data journey and how the Draft GIS Data Schema is intended to be a phased approach. Below, SCE describes the information contained in the Q4 2020 QDR¹ and the information included in the 2021 WMP Update.

The confidential geodatabase is being submitted through the California Public Utilities Commission's (CPUC) Kiteworks system. Non-confidential spatial data is posted on SCE's WMP webpage. The geodatabase has been provided in SCE's past Quarterly Reports in compliance with Resolution WSD-002 Class B deficiency Guidance-10. The geodatabase narrative is included in the Q4 2020 QDR within Guidance-10. SCE is also providing the Status Report in the Excel file template provided by the WSD that further denotes what spatial data SCE is providing and what is not available at this time.

In addition, SCE is serving notice of availability of the non-spatial data pursuant to Resolution WSD-011, Attachment 2.3 within Tables 1-12. SCE is also including a pdf version of these tables in Appendix 9.7 in our 2021 WMP Update. The narrative accompanying these tables is included in Chapter 6 of SCE's 2021 WMP Update. Subsequent QDRs, not submitted concurrently with an annual WMP submission, will include the pdf version and description of the data for these tables.

In our Q4 2020 QDR, we are also including a response to an ongoing requirement for Class B deficiency SCE-9 pursuant to Resolution WSD-004 as this deficiency also requires spatial data that is included in the geodatabase. SCE has three additional ongoing deficiency requirements (Guidance-9, SCE-5, and SCE-20) pursuant to Resolutions WSD-002 and WSD-004. Responses to these ongoing deficiency requirements are included in SCE's 2021 WMP Update. The location (e.g., 2021 WMP Update chapter / section number) for responses to the five ongoing Class B deficiencies are further detailed in the table below.

¹ The Draft Compliance Protocols explain that the QDR is to include 1) a geodatabase providing quarterly updates on planned, in-progress, and completed initiative activity points, lines and polygons and 2) a non-spatial Excel file that includes all requested data within the WSD's template. Additionally, Resolution WSD-011, Attachment 3, explains that the ongoing quarterly data reporting requirements adopted in Resolutions WSD-002 and WSD-004 regarding 2020 Class B deficiencies and conditions are still required and are to be submitted alongside the new quarterly data submissions.

Ongoing Quarterly Report Deficiency	Location / Description
Guidance-9, Insufficient Discussion of Pilot Programs	SCE responds to conditions i. – v. in the 2021 WMP Update in Section 7.1.D. Additionally, SCE will be providing further details on February 26, 2021 in its supplemental filing regarding its technologies in response to Action SCE-8 that was included in the WSD’s evaluation of SCE’s first Quarterly Report.
Guidance-10, Data Issues - General	Spatial data is included in the geodatabase, submitted through the CPUC's Kiteworks system. Non-confidential spatial data is located on SCE's WMP webpage. Description of the spatial data and updated responses to conditions i. – iv. are included in the Q4 2020 QDR.
SCE-5, Detailed timeline of WRRM implementation not provided	SCE responds to conditions i. – v. in Chapter 4 of SCE’s 2021 WMP Update. Section 4.3.1 provides an overview of the WRRM’s Probability of Ignitions (POI) and Consequence at the asset level, which allows SCE to prioritize programs using asset and circuit-segment level risk rankings by targeting the assets and/or circuit-segments with the highest wildfire risk. Section 4.3.2 explains how WRRM is used to inform decision-making. Section 4.3.3 provides a comprehensive overview of the WRRM framework. Section 4.3.4 explains the PSPS component of the WRRM. Section 4.3.5 explains the POI models in the wildfire component of the WRRM. Section 4.3.6 explains the ignition consequence models within the WRRM. Section 4.3.7 explains the details of the WRRM outputs used in the Multi-Attribute Risk Score (MARS) framework. Section 4.3.8 explains how the WRRM was able to help calculate RSEs at a more granular level. Section 4.3.9 explains how the WRRM is being used to make risk-informed decisions for both existing and in-flight WMP activities as well as for new wildfire initiatives and emergent issues. Section 4.3.10 describes future improvements to the WRRM. Section 4.5.1 then describes the details of the models in the WRRM including, for example, the models’ purpose, methodology, and timeline. Additionally, please see SCE’s response to the first Quarterly Report Action Statement SCE-12 for this deficiency, included in Appendix 9.6 of the 2021 WMP Update. SCE’s response to the first Quarterly Report Action Statement SCE-13 for this deficiency will be included in SCE’s February 26, 2021 supplemental filing.
SCE-9, Lack of detail regarding Pole Loading Assessment Program	Spatial PLP data is included in the geodatabase. Non-confidential spatial data is located on SCE's WMP webpage. Description of the PLP spatial data and updated responses to conditions i. – ii. are included in the Q4 2020 QDR. Additionally, SCE will be providing further details on February 26, 2021 in its supplemental filing regarding planned versus recorded work in response to Action SCE-9 that was included in the WSD’s evaluation of SCE’s first Quarterly Report.
SCE-20, Notification fatigue from frequency of PSPS communications	SCE responds to conditions i. – iv. in Section 8.5 of its 2021 WMP Update. The response includes PSPS notification counts for the time period October to December 2020.

We look forward to continuing to work with the CPUC, WSD and other stakeholders to build a more resilient California. If you have any questions, or require additional information, please contact me at carla.peterman@sce.com.

Sincerely,

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Senior Vice President, Strategy and Regulatory
Affairs Southern California Edison

cc: R-18-10-007
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