

Docket #: 2023-2025-WMPs

August 14, 2023

Shannon O'Rourke Deputy Director Office of Energy Infrastructure Safety 715 P Street, 20th Floor Sacramento, CA 95814

**SUBJECT:** SCE's Submission of Additional Errata for the 2023-2025 Wildfire Mitigation Plan

Dear Deputy Director O'Rourke:

SCE appreciates the opportunity to submit additional substantial errata to its 2023-2025 Wildfire Mitigation Plan (WMP).

SCE requests consideration of a correction to the target for VM-7, the initiative focused on vegetation inspections for distribution grids in HFRA. The 2023-2025 annual targets for this initiative should be updated from 902 to 770, with corresponding updates to the quarterly targets. The prior count was based on an outdated data source that included some non-HFRA grids. The issue has since been resolved.

For context, these inspections are performed across SCE's service area. SCE endeavors to annually inspect all distribution grids (both HFRA and non-HFRA) in its service territory for vegetation clearance. The WMP target (VM-7) only applies to the subset of inspections for distribution grids that lie within SCE's HFRA. Hence our proposed correction to the target does not reflect a reduction in the amount of work we are performing both within and outside of HFRA; it simply provides an updated count of how many of those grids are within HFRA and should be counted toward the target.

SCE has provided the specific corrections to address this error, which are based on the WMP submitted to the Office of Energy Infrastructure Safety on March 27, 2023 (version "R0"), and also include corrections submitted on April 6, 2023.

SCE's WMP and associated materials are available at: <a href="https://www.sce.com/safety/wild-fire-mitigation">https://www.sce.com/safety/wild-fire-mitigation</a>.

SCE appreciates the opportunity to submit this correction. If you have questions, or require additional information, please contact me at gary.chen@sce.com.

Sincerely,

//s//
Gary Chen
Director, Safety & Infrastructure Policy
gary.chen@sce.com

## **TABLE OF ERRATA**

| Substantive?<br>(Y/N) | Section | Table or Figure<br>(if applicable) | Page<br>Number(s) | Description of error and correction  |
|-----------------------|---------|------------------------------------|-------------------|--|
| Y                     | 8.2.1.2 | Table 8-15                         | 380               | The 2023-2025 annual targets for this initiative should be updated from 902 to 770, with corresponding updates to the quarterly targets. The prior count was based on an outdated data source that included some non-HFRA grids. |

Corrections to the 3/27/23 WMP to address the error identified in the table above are on the following page.

## SCE corrections for VM-7 submitted on Aug 14, 2023 (shown relative to corrections submitted on April 6, 2023).

| Initiative<br>Activity   | Tracking<br>ID | Target End of<br>Q2 2023 & Unit                      | Target<br>End of Q3<br>2023 &<br>Unit                | End of Year Target<br>2023 & Unit   | x%<br>Risk<br>Impact<br>2023 | % in<br>SRA/HCA<br>2023 | Target<br>End of<br>Q2 2024<br>& Unit                | Target<br>End of<br>Q3 2024<br>& Unit                | End of Year Target<br>2024 & Unit  | x%<br>Risk<br>Impact<br>2024 | % in<br>SRA/HCA<br>2024 | Target 2025 & Unit   | x%<br>Risk<br>Impact<br>2025 | % in<br>SRA/HCA<br>2025 | Method of<br>Verification                  |
|--|----------------|--|--|---|------------------------------|-------------------------|--|--|--|------------------------------|-------------------------|--|------------------------------|-------------------------|--|
|  |                |  |  | dead and dying trees with strike potential within those grids/circuits  |                              |                         |  |  | with strike potential within those grids/ circuits* (see insertion text above)   |                              |                         | within those grids/circuits* (see insertion text above) Note: 2025 schedule will be developed at the circuit / span level, subject to change   |                              |                         | for<br>inspection<br>and<br>mitigation     |
| Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Distribution Lines in HFRA | VM-7           | 1,088 514 308  Additional correction as of 8/14/2023 | 1,508 753 539  Additional correction as of 8/14/2023 | SCE plans to inspect 1,900 902 770 grids within our distribution system*  (see insertion text above)  Additional correction as of 8/14/2023 | 100%                         | 75%                     | 1,088 514 308  Additional correction as of 8/14/2023 | 1,508 753 539  Additional correction as of 8/14/2023 | SCE plans to inspect 1,900 902 770 grids within our distribution system*  (see insertion text above)  Additional correction as of 8/14/2023      | 100%                         | 75%<br>Add              | SCE plans to inspect  1,900 902 770 grids/circuits within our distribution system* itional correction as of 8/14/2023 Note: 2025 schedule will be developed at the circuit /span level, subject to change  (see insertion text above)  | 100%                         | 75%                     | Listing of all<br>completed<br>work orders |
| Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Transmission Lines in HFRA | VM-8           | <del>619</del><br>273                                | 884<br>378   | SCE plans to inspect 1,000 416 circuits grids within our transmission system*  (see insertion text above)                                   | 100%                         | 75%                     | 619<br>273   | 884<br>378   | SCE plans to inspect 416 1,000 circuits grids within our transmission system*  (see insertion text above)  | 100%                         | 75%                     | SCE plans to inspect  1,000 416 circuits grids within our transmission system*  Note: 2025 schedule will be developed at the circuit /span level, subject to change  (see insertion text above)  | 100%                         | 75%                     | Listing of all<br>completed<br>work orders |
| LiDAR Distribution Vegetation Inspections  | VM-9           | 650  | 1,020  | SCE will inspect at least  1,020 HFRA circuit miles  *Subject to change based on technology, program adjustments, and grid/circuits layout  | 7%                           | 78%                     | 650  | 1,020  | SCE will inspect at least <b>1,020</b> HFRA circuit miles  *Subject to change based on technology, program adjustments, and grid/circuits layout | N/A                          | N/A                     | *SCE will inspect at least 1,020 HFRA circuit miles  *Subject to change based on technology, program adjustments, and grid/circuits layout. Targets for 2025 for HFRA LiDAR miles assume continuation of support of ground inspections and do not reflect SCE's planned transition to remote sensing for | N/A                          | N/A                     | Listing of all<br>completed<br>work orders |