

Southern California Edison
2023-WMPs – 2023-WMPs

DATA REQUEST SET Cal Advocates - SCE - 2023 WMP - 15

To: Cal Advocates
Prepared by: Boonping Goh
Job Title: Senior Advisor
Received Date: 5/4/2023

Response Date: 5/9/2023

Question 03:

Regarding SCE's November 19, 2022 PSPS Post-Event Report¹

- a) Please identify the two circuits SCE de-energized that were not originally in scope
- b) For circuits listed in part a), please state the time when SCE brought them into scope (e.g., how many hours prior to de-energization).
- c) For each circuit that SCE determined was in scope prior to de-energization, as well as the two circuits in part a), please fill in the table shown below listing the relevant conditions forecasted (e.g., FPI, sustained wind speed, gust wind speed) and actual conditions at each of the following points in time:

Table 1. Actual versus Forecasted conditions for November 19, 2022 PSPS event.				
Circuit Name/Segment	Time	Relevant Conditions		
		FPI	Sustained Wind Speed	Gust Wind Speed
	Forecast prior to de-energization			
	Forecast at time of de-energization			
	Actual at time of de-energization			

Response to Question 03:

SCE objects to Question 3 because the WMP proceeding is not the appropriate venue for this type of data request. Question 3, by its own terms, is “regarding SCE’s November 19, 2022 PSPS Post-

¹ *Southern California Edison Company's (U 338-E) Public Safety Power Shutoff Post-Event Report for November 19, 2022 De-energization Event dated December 6, 2022.* <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-and-enforcement-division/reports/psps-post-event-reports/2022/r1812005-sce-psps-post-event-report-for-11-19-22-de-energization-event.pdf>

Event Report” which was filed by SCE in the PSPS OIR proceeding (R.18-12-005), not SCE’s 2023-2025 WMP. In addition, Cal Advocates has previously submitted through the PSPS OIR proceeding (and SCE has responded to) multiple analogous data requests related to SCE’s 2022 PSPS events. As such, this data request will not further the ability to make informed public comments on SCE’s WMP.

SCE further objects to Question 3 to the extent it seeks production of information that can readily be found in SCE’s 2022 Post-Event Reports and the 2022 Post-Season Data Report, which are available on the CPUC’s website. The Commission has made clear that there should be no duplication of information across different reports or proceedings such as the WMP and the PSPS OIR. *See* D. 21-06-034 p. 146 (“We note, however, that many of the items of information recommended by the parties . . . are already required elements of [the IOUs’] Wildfire Mitigation Plans, and we do not seek to duplicate reporting requirements across different reports or proceedings.”). For example, the requested information on “Sustained Wind Speed” and “Gust Wind Speed” for the two circuits in question (Brennan and Morganstein) is included in SCE’s 2022 Post-Season Data Report.² Similarly, SCE’s Post-Event Report for the November 19, 2022 PSPS event includes actual FPI, actual Sustained Wind Speed and actual Gust Wind Speed for all de-energized circuits.³ SCE also provided in the Post-Event Report a comparison of “forecasted versus actual weather parameters.”⁴

² SCE’s 2022 Post-Season Data Report includes the following information for each de-energized circuit in Worksheet “9. Decision Factors,” Section A. Forecast and Reported Meteorology: Sustained wind speeds (mph), and Gust wind speeds (mph). Additional information about why these two circuits were not originally in scope for the November 19, 2022 PSPS event can be found in SCE’s Reply Comments to Parties’ Opening Comments Regarding Post-Season Reports for the 2022 Public Safety Power Shutoff Events.

³ *See* SCE’s Post-Event Report for November 19, 2022 PSPS Event, Section 2, Table 2 at p. 6.

⁴ *Id.* p. 10.