

Southern California Edison
2025-WMPs – 2025-WMPs

DATA REQUEST SET CalAdvocates-SCE-2025WMP-11

To: Cal Advocates
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Job Title: Senior Manager
Received Date: 4/26/2024

Response Date: 5/1/2024

Question 02:

SCE states on p. 27 of its 2025 WMP Update that it is reducing its compliance target for its Rapid Earth Fault Current Limiter (REFCL) Ground Fault Neutralizer (GFN) Program from four substations to two substations. SCE also states that it is increasing its strive target for its REFCL GFN program from two substations to four substations. SCE states that this is due to expected material, supply, and engineering challenges, and further elaborates on these challenges in its response to Cal Advocates data request CalAdvocates-SCE-2025WMP-04, Question 3.

- a. Please justify SCE's continued use of REFCL as a feasible and deployable wildfire mitigation strategy for purposes of its 2025 WMP Update in light of the above-referenced material, supply, and engineering challenges. Provide any available and pertinent supporting documentation for your answer (e.g. reports, workpapers, etc.).
- b. Please justify SCE's continued use of Covered Conductor + REFCL as a viable combination of mitigations for purposes of its 2025 WMP Update in light of the above-referenced material, supply, and engineering challenges. Provide any available and pertinent supporting documentation for your answer (e.g. reports, workpapers, etc.).
- c. Please justify SCE's use of Covered Conductor + REFCL as a point of comparison to Undergrounding for purposes of its Net Present Value Analysis on p. 62 of its 2025 WMP Update. Provide any available and pertinent supporting documentation for your answer (e.g. reports, workpapers, etc.).

Response to Question 02:

a. Please justify SCE's continued use of REFCL as a feasible and deployable wildfire mitigation strategy for purposes of its 2025 WMP Update in light of the above-referenced material, supply, and engineering challenges. Provide any available and pertinent supporting documentation for your answer (e.g. reports, workpapers, etc.).

SCE respectfully disagrees with the premise of this question, that SCE must "justify" REFCL "in light of the above-referenced material, supply, and engineering challenges." As SCE stated in its response to Question 3 of the data request set CalAdvocates-SCE-2025WMP-04:

"SCE continues to be the leading utility in North America with the deployment of REFCL technologies, and further notes that all of its 2025 WMP targets, including for SH-17, were developed in early 2023 based on SCE's best available information at the time. Forecasting a target three years in advance is inherently uncertain, especially for complex and technologically innovative work such as REFCL."

REFCL is not a “plug-and-play” solution that can be rapidly deployed at a utility scale. REFCL continues to be a promising and effective wildfire mitigation, and serves a valuable role in SCE’s portfolio of wildfire mitigation, both as a complement to covered conductor and as a mitigation choice where undergrounding is either not needed or is not feasible.

The delays in REFCL deployment are not unreasonable considering the complexity and novelty of the technology, and are relatively insignificant when considering the multi-decade useful life of REFCL, and are not a sufficient basis to question the viability or value of REFCL as a long-term wildfire mitigation. REFCL continues to be a valuable and promising mitigation in SCE’s portfolio and is appropriate for continued development and implementation.

b. Please justify SCE’s continued use of Covered Conductor + REFCL as a viable combination of mitigations for purposes of its 2025 WMP Update in light of the above-referenced material, supply, and engineering challenges. Provide any available and pertinent supporting documentation for your answer (e.g. reports, workpapers, etc.).

Please see above response to part a).

c. Please justify SCE’s use of Covered Conductor + REFCL as a point of comparison to Undergrounding for purposes of its Net Present Value Analysis on p. 62 of its 2025 WMP Update. Provide any available and pertinent supporting documentation for your answer (e.g. reports, workpapers, etc.).

OEIS required SCE to perform an analysis comparing targeted undergrounding to combinations of mitigations. And while SCE is currently experiencing challenges when implementing REFCL, SCE is unaware of any other suite of initiatives that provide as much risk mitigation as targeted undergrounding or, alternatively, REFCL combined with covered conductor, asset inspections, and vegetation management (CC/REFCL++). Accordingly, SCE conducted the analysis comparing CC/REFCL++ to targeted undergrounding. The analysis SCE presented in its response to ACI SCE-23-09 indicated that CC/REFCL++ provides a NPV risk reduction of 1.4 relative to the NPV of target undergrounding of 1.6. In other words, over the long term, targeted undergrounding provides a higher level of risk reduction.

As SCE has explained in its 2023-2025 WMP, targeted undergrounding is selected for areas with the highest levels of wildfire risk based on SCE’s Integrated Wildfire Mitigation Strategy (IWMS). Although CC/REFCL++ does not provide the same level of wildfire risk reduction as targeted undergrounding, it reduces the risk substantially and can be an appropriate choice in areas where wildfire risk is high but not as high as where undergrounding is warranted.