

*Southern California Edison*  
*2023-WMPs – 2023-WMPs*

**DATA REQUEST SET Cal Advocates - SCE - 2023 WMP - 08**

**To: Cal Advocates**  
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**Job Title: Advisor**  
**Received Date: 4/5/2023**

**Response Date: 4/10/2023**

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**Question 17:**

Referring to section 8.1.2.3 Distribution Pole Replacements and Reinforcements, on p.258 of your WMP, SCE states that:

The PLP Program assesses the safety factor of a pole to identify instances that do not meet either GO 95 or SCE's internal requirements that exceed GO 95. Poles that do not meet these requirements are documented and scheduled for either repair or replacement.

Regarding the Pole Loading Program (PLP):

- a) How does SCE select and prioritize which poles to inspect and replace through the Pole Loading Program? Please address how SCE considers age, location, wildfire risk, and any other factors.
- b) Please provide the total number of poles that have been repaired or replaced under the PLP in the last 10 years.
- c) How many more poles are scheduled for repair or replacement in 2023 - 2028?
- d) Are there any specific criteria or guidelines that SCE uses to determine whether a pole should be repaired, replaced, or left as-is under the PLP, and how are these decisions made?
- e) How does SCE track the progress of pole replacements and repairs to ensure that all poles identified for work are addressed in a timely manner?
- f) Please describe any challenges or bottlenecks that SCE has faced in implementing the PLP.
- g) How has SCE addressed the challenges noted in your response to the previous part?

**Response to Question 17:**

*a) How does SCE select and prioritize which poles to inspect and replace through the Pole Loading Program? Please address how SCE considers age, location, wildfire risk, and any other factors.*

PLP was a one-time field assessment program from 2014 – 2021 in which scheduling, and prioritization was based on factors including various safety-driven priorities, including high fire and wind designations, as well as operational efficiencies. High-fire and wind designations (e.g., the CPUC's introduction of High-Fire Tiers 2 and 3) evolved throughout the lifecycle of the PLP and were frequently reevaluated.

*b) Please provide the total number of poles that have been repaired or replaced under the PLP in the last 10 years.*

The table below provides the total number of poles replaced under the PLP between 2013-2022. Please note that the PLP pilot began in 2013 and was implemented as a program in 2014.

| Type         | 2013 | 2014 | 2015   | 2016  | 2017  | 2018  | 2019  | 2020  | 2021   | 2022   | Total  |
|--------------|------|------|--------|-------|-------|-------|-------|-------|--------|--------|--------|
| Distribution | 0    | 295  | 10,317 | 5,565 | 5,584 | 6,817 | 7,192 | 3,310 | 11,629 | 14,306 | 65,015 |
| Transmission | 0    | 4    | 373    | 356   | 555   | 869   | 1,227 | 622   | 783    | 795    | 5,584  |
| Total        | 0    | 299  | 10,690 | 5,921 | 6,139 | 7,686 | 8,419 | 3,932 | 12,412 | 15,101 | 70,599 |

The table below provides the total number of poles repairs under the PLP between 2013-2022.

| Type         | 2013 | 2014 | 2015 | 2016  | 2017  | 2018  | 2019  | 2020  | 2021  | 2022 | Total  |
|--------------|------|------|------|-------|-------|-------|-------|-------|-------|------|--------|
| Distribution | 0    | 20   | 485  | 1,002 | 1,781 | 1,500 | 1,531 | 3,924 | 1,966 | 351  | 12,560 |
| Transmission | 0    | 0    | 4    | 11    | 57    | 16    | 50    | 73    | 132   | 23   | 366    |
| Total        | 0    | 20   | 489  | 1,013 | 1,838 | 1,516 | 1,581 | 3,997 | 2,098 | 374  | 12,926 |

c) How many more poles are scheduled for repair or replacement in 2023 - 2028?

SCE is including data for 2023-2025, which covers this WMP period. SCE will be finalizing its forecast for 2026-2028 as part of its SCE's 2025 General Rate Case, which will be filed in May 2023.

The table below provides the number of PLP poles forecasted to be replaced between 2023-2025.

| Type         | 2023   | 2024  | 2025 | Total  |
|--------------|--------|-------|------|--------|
| Distribution | 10,276 | 4,485 | 342  | 15,103 |
| Transmission | 697    | 380   | 21   | 1,098  |
| Total        | 10,973 | 4,865 | 363  | 16,201 |

The table below provides the number of PLP poles forecasted to be repaired between 2023-2025.

| Type         | 2023 | 2024 | 2025 | Total |
|--------------|------|------|------|-------|
| Distribution | 25   | 0    | 0    | 25    |
| Transmission | 10   | 0    | 0    | 10    |
| Total        | 35   | 0    | 0    | 35    |

d) Are there any specific criteria or guidelines that SCE uses to determine whether a pole should be repaired, replaced, or left as-is under the PLP, and how are these decisions made?

Pole Loading Program (PLP) assessments were performed to determine a pole's safety factor. Pole loading assessments require a field assessment and a desktop analysis to calculate each pole's safety factor. Inputs to the analysis include the physical attributes of the pole, its attachments, and the applicable wind loading for the pole. The field assessment measures, or validates, the pole's attributes (e.g. type of pole, species of wood, height, and class) and the type and size of equipment it supports. The information collected during the field assessment is input to perform a desktop analysis using SPIDACalc to calculate the pole's safety factor. Poles with failing safety factors are identified for replacement.

e) How does SCE track the progress of pole replacements and repairs to ensure that all poles identified for work are addressed in a timely manner?

SCE uses a variety of tools, processes, and project management principles to track the end-to-end progress of pole replacements and repairs to help ensure that all identified poles are addressed in a timely manner. SCE maintains a detailed inventory database of all utility poles and their condition. This allows SCE to prioritize poles that require the most urgent attention and track the progress of work orders as they are completed.

SCE utilizes various tools, such as digital forms, to document and track the condition of each pole and assign work orders to repair or replace them as necessary. Additionally, SCE employs various reporting systems to track the progress of work orders and monitor completion rates. This allows SCE to quickly identify any issues or delays and take corrective action to ensure that all poles are addressed in a timely manner.

*f) Please describe any challenges or bottlenecks that SCE has faced in implementing the PLP.*

PLP encountered and overcame several challenges throughout its implementation, ranging from technological and engineering challenges as well as various challenges in field collection, such as hazardous terrain, inclement weather, floral and faunal safety concerns, and restricted access on lands owned by both private entities and governmental agencies.

*g) How has SCE addressed the challenges noted in your response to the previous part?*

SCE addressed and overcame each challenge as they arose. Technical challenges were overcome in partnership with internal technical support as well as 3<sup>rd</sup>-party service providers. Engineering standards were consistently reviewed and updated throughout PLP execution. Vendors hired and trained specialized crews to handle hazardous terrain, re-arranged scheduled scope to address seasonal weather issues, engaged internal and external vegetation and animal specialists, and worked closely with various internal and external stakeholders to schedule and achieve safe and permissible access to properties and areas with various identified restrictions.