

Southern California Edison
2023-WMPs – 2023-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 3 - S C E - 0 0 3

To: Energy Safety
Prepared by: Tram Camba
Job Title: Wildfire Safety – Sr Advisor
Received Date: 5/11/2023

Response Date: 5/16/2023

Question 01:

Regarding SCE's Risk Framework:

- a. Provide the percentage and number of circuit miles for system hardening (including a breakdown for both covered conductor and undergrounding) that apply to each of the following criteria for Severe Risk Areas, as shown in Table SCE 6-03:
 - i. Population egress
 - ii. High fire frequency location
 - iii. Burn-in buffer
 - iv. Significant fire consequence
 - v. High winds
 - vi. Communities of Elevated Fire Concern
- b. Provide the percentage and number of circuit miles for system hardening (including a breakdown for both covered conductor and undergrounding) that apply to each of the following criteria for High Consequence Areas, as shown in Table SCE 6-03:
 - i. Not identified in meeting Severe Risk Area criteria (if such differs from ii and iii)
 - ii. Destructive fire consequence
 - iii. Locations subject to PSPS events
- c. Provide the percentage and number of circuit miles for system hardening (including a breakdown for both covered conductor and undergrounding) that apply to each of the following criteria for Other HFRA, as shown in Table SCE 6-03:
 - i. Not identified in meeting Severe Risk Area of High Consequence criteria (if such differs from ii)
 - ii. Small fire consequence
- d. Define and explain what is meant by "Not identified in meeting Severe Risk Area criteria" for High Consequence Areas.
- e. Define and explain what is meant by "Not identified in meeting Severe Risk Area or High Consequence criteria" for Other HFRA criteria.
- f. What is the expected timeline for hardening the miles identified under "Other HFRA"?

Response to Question 01:

- a. Provide the percentage and number of circuit miles for system hardening (including a breakdown for both covered conductor and undergrounding) that apply to each of the following criteria for Severe Risk Areas, as shown in Table SCE 6-03:*
- i. Population egress*
 - ii. High fire frequency location*

- iii. *Burn-in buffer*
- iv. *Significant fire consequence*
- v. *High winds*
- vi. *Communities of Elevated Fire Concern*

The percentage and number of circuit miles within Severe Risk Areas criteria #1-#4 are shown below.

Severe Risk Areas	Total Circuit Miles (Rounded)	Percentage to Total Severe Risk Areas Miles	Percentage to Total Miles in HFRA (Distribution)
Criteria #1: Egress Constraints, High Fire Frequency & Burn-In	1,200	41%	13%
Criteria #2: Significant Fire Consequence	900	31%	9%
Criteria #3: Communities of Elevated Fire Concern (CEFC)	550	19%	6%
Criteria #4: High Wind Locations	300	10%	3%
Total Severe Risk Areas Miles	2,950	100%	31%
Total Miles in HFRA (Distribution)	9,600		

These numbers are current as of April 2023. In some cases, a location may meet more than one criterion. In such instances, the location is included in the total based on the sequence as shown in the table above. For example, if a location meets both criteria #1 and #2, it will be listed within the total for criteria #1 and not in the total for criteria #2. They are subject to change pending further SME review, as described in section 6.2.1.2 of the 2023-2025 WMP.

b. Provide the percentage and number of circuit miles for system hardening (including a breakdown for both covered conductor and undergrounding) that apply to each of the following criteria for High Consequence Areas, as shown in Table SCE 6-03:

- i. Not identified in meeting Severe Risk Area criteria (if such differs from ii and iii)*
- ii. Destructive fire consequence*
- iii. Locations subject to PSPS events*

The percentage and number of circuit miles within High Consequence Areas criteria #1-#3 are shown below. All 4,400 miles are in High Consequence Areas criteria #2 because the ordering of severity considers destructive fire consequence first, then high wind locations (similar to the explanation above). Since all 4,400 miles have consequence between 300 and 10,000, they are all bucketed in criteria #2. Also, please see the response in subpart (d) for an explanation of “Not identified in meeting Severe Risk Area criteria.”

	Total Circuit Miles (Rounded)	Percentage to Total High Consequence Areas Miles	Percentage to Total Miles in HFRA (Distribution)
High Consequence Areas			
Criteria #1: Not identified in meeting Severe Risk Area criteria	N/A	N/A	N/A
Criteria #2: Destructive fire consequence	4,400	100%	46%
Criteria #3: High Wind Locations	-	0%	0%
Total High Consequence Areas Miles	4,400	100%	46%
Total Miles in HFRA (Distribution)	9,600		

c. Provide the percentage and number of circuit miles for system hardening (including a breakdown for both covered conductor and undergrounding) that apply to each of the following criteria for Other HFRA, as shown in Table SCE 6-03:

- i. Not identified in meeting Severe Risk Area of High Consequence criteria (if such differs from ii)
- ii. Small fire consequence

The percentage and number of circuit miles within Other HFRA criteria #1-#2 are shown below. Please see the response in subpart (e) for an explanation of “Not identified in meeting Severe Risk Area or High Consequence criteria.”

	Total Circuit Miles (Rounded)	Percentage to Total Other HFRA Miles	Percentage to Total Miles in HFRA (Distribution)
Other HFRA			
Criteria #1: Not identified in meeting Severe Risk Area or High Consequence criteria	N/A	N/A	N/A
Criteria #2: Small fire consequence	2,250	100%	23%
Total Other HFRA Miles	2,250	100%	23%
Total Miles in HFRA (Distribution)	9,600		

d. Define and explain what is meant by “Not identified in meeting Severe Risk Area criteria” for High Consequence Areas.

SCE includes the clause “Not identified in meeting Severe Risk Area criteria” for High Consequence Areas so that the count of the locations within each risk tranche is mutually exclusive. For instance, it is possible that a location is both egress-constrained and has 1,000 acres burn consequence within an 8-hour unsuppressed model simulation. In this case, this location would meet the Severe Risk Area Criteria #1 since it is egress constrained. Although this location has an acres burned consequence between 300 and 10,000, which is a High Consequence Area characteristic, SCE would not count it in the High Consequence risk tranche because it was already counted in the Severe Risk Area risk tranche.

e. Define and explain what is meant by “Not identified in meeting Severe Risk Area or High Consequence criteria” for Other HFRA criteria.

Similar to the explanation in subpart (d) above, SCE includes the clause “Not identified in meeting Severe Risk Area or High Consequence criteria” for Other HFRA so that the count of the locations within each risk tranche is mutually exclusive. Miles that fall within this classification do not meet the criteria to be classified as either Severe Risk Area or High Consequence. For example, it is possible that a location is in a Community of Elevated Fire Concern (CEFC) and has a 200 acres burn consequence within an 8-hour unsuppressed model simulation. In this case, this location would meet the Severe Risk Area Criteria #4. Although this location has an acres burned consequence less than 300, which is an Other HFRA characteristic, SCE would not count it in the Other HFRA risk tranche because it was already counted in the Severe Risk Area risk tranche.

f. What is the expected timeline for hardening the miles identified under “Other HFRA”?

Under the current model, SCE expects to harden approximately 60% of the Other HFRA miles by the end of 2028. The remaining miles may be addressed through other non-wildfire programs such as the Overhead Conductor Program. It is also possible that newer risk models become available in the future to account for factors such as climate change, which may elevate the risk of the Other HFRA miles and shift them into the Severe Risk or High Consequence Areas. In that case, SCE may address those elevated miles sooner rather than later.