Southern California Edison
2025-WMPs – 2025-WMPs

DATA REQUEST SET C a l A d v o c a t e s - S C E - 2 0 2 5 W M P - 0 5

To: Cal Advocates
Prepared by: Hunly Chy
Job Title: Senior Manager
Received Date: 4/9/2024

Response Date: 4/12/2024

Question 03:
ACI SCE-23-09 (Hardening Severe Risk Areas) states "For facilities in its SRA that have not undergone covered conductor installation, SCE does not perform adequate analysis of alternative mitigation plans and instead is often prioritizing undergrounding over other mitigations."^9

Required Progress Item #1 for ACI SCE-23-09 is to "Demonstrate adequate risk reduction for any areas planned for undergrounding via interim mitigation strategies, accounting for all ignition risk drivers."^10

SCE states in response to this required progress item, "For areas where SCE plans to implement targeted undergrounding, SCE has a suite of interim wildfire mitigation activities to identify and remediate risk while the targeted undergrounding is being planned, designed, and constructed."^11

a) Please state the cumulative percentage risk reduction that SCE estimates it will achieve through the abovementioned interim mitigations.

b) State the basis for your answer to part (a).

c) Has SCE conducted any analyses, studies, or research supporting the answer to (a)?

d) If the answer to part (c) is "yes," please provide a copy of all available reports, analyses, studies, or research supporting the answer to part (a).

e) Are the abovementioned interim mitigations different than those performed in areas targeted for Covered Conductor installation?

f) If the answer to part (e) is yes, please explain the difference between the interim mitigations that SCE performs in areas identified for targeted undergrounding versus Covered Conductor installation.

g) Are the abovementioned interim mitigations different than those performed in areas where neither Covered Conductor installation nor undergrounding is planned?

h) If the answer to subpart (g) is yes, please explain the difference between SCE's suite of interim mitigations in areas targeted for undergrounding versus the mitigations SCE performs in areas targeted for neither covered conductor installation nor undergrounding.

[9] SCE 2025 WMP Update at 60, Office of Energy Infrastructure Safety, *Decision on 2023-2025 Wildfire Mitigation Plan: Southern California Edison Company*, October 24, 2023, at 86076.

[10] SCE 2025 WMP Update at 60.

[11] SCE 2025 WMP Update at 60.

Response to Question 03:

a) Please state the cumulative percentage risk reduction that SCE estimates it will achieve through the abovementioned interim mitigations.

SCE interprets the cumulative percentage risk reduction to mean combined mitigation effectiveness (ME) of the interim mitigations.

As stated in SCE 2025 WMP Update at page 60, SCE performs risk-prioritized inspections, vegetation management, and employs fast curve settings. Additionally, as a last resort, SCE will also employ Public Safety Power Shutoffs (PSPS) if conditions necessitate it. The combined mitigation effectiveness for inspection and vegetation management for all ignition drives is about 46%.

When performing this analysis, SCE did not include the mitigation effectiveness of fast curve settings in CC/REFCL++ because the incremental benefit to that combined mitigation suite is currently undetermined. Thus, for simplicity and parity, SCE also did not include the mitigation effectiveness of fast curve settings in the interim mitigations. Although fast curve settings would have more incremental benefit in a situation without covered conductor and REFCL, including its mitigation effectiveness would not have changed the conclusion of the analysis (i.e., greater overall risk reduction achieved through targeted undergrounding).

PSPS is a tool of last resort and therefore was not included in the combined ME analysis described above, although it effectively eliminates wildfire risk due to de-energizing utility lines.

b) State the basis for your answer to part (a).

As stated in part (a), SCE calculated the combined mitigation effectiveness from the individual subdrivers ME for inspection and vegetation management. The combined ME at the sub-drivers were performed using a straight equation to combine ME (i.e., no comparison was made to compare overlap between MEs). As provided in SCE's 2023 WMP (p. 897), the equation used to combine ME is $1-(1-ME_1)*(1-ME_2)...*(1-ME_n)$.

c) Has SCE conducted any analyses, studies, or research supporting the answer to (a)?

The analyses for the combined ME value are provided in the attached file, "CalAdvocates-SCE-2025WMP-05-03_Combined_ME_Interim Mitigations.xlsx".

The rationale and data source for the ME values for the different activities are as follows:

IN-1.1 (Inspection): SCE records notifications and faults by sub-driver. This ME is based on SCE's observed field conditions in HFRA from 2019 to June 2022, i.e., proactive observations (P1 and P2 notifications) and reactive (fault) observations. Notifications were filtered for the specific inspection activity and limited to conditions that would impact the primary conductors.

The method used for the mitigation effectiveness is subtract the total reactive (fault) observations divided by the total sum of the reactive (fault) observations and proactive observations (P1 and P2 notifications).

VM-1 (Hazard Tree Management Program): ME value is based on evaluation of 2016 - June 2022 TCCIs (Tree Caused Circuit Interruptions) that would have been mitigated by heavy tree contact (i.e., failing heavy tree). All "Fall-in" and "Blow-in" TCCIs on trees not normally trimmed are attributed to DRI ME. Final ME value is reduced by QC haircut based on QC findings of HTMP trees from Jan 2021 through July 2022.

VM-2 (Expanded Pole Brushing): Based on evaluation of CPUC reportable ignition rates on poles brushed vs. not brushed from 2020 through August of 2022. Analysis looked at all equipment/facility failure (EFF) CPUC reportable ignitions during the time period and overlapped completed pole brushing data to determine failure rates. Poles that had been brushed within 12 months of ignition were found to have a 39% less EFF CPUC reportable ignition rate than those that were never brushed.

VM-NA (Expanded Line Clearing): ME value is based on evaluation of 2016 - June 2022 TCCIs that would have been mitigated by vegetation contact in routine inventory. All "Fall-in", "Blow-in", and "Grow-in" TCCIs on trees normally trimmed are attributed to Expanded Line Clearing ME. Final ME value is reduced by actual GRCD clearance rate reported by Quality Control inspections results.

d) If the answer to part (c) is "yes," please provide a copy of all available reports, analyses, studies, or research supporting the answer to part (a).

Please see response to part (c).

e) Are the abovementioned interim mitigations different than those performed in areas targeted for Covered Conductor installation?

The interim mitigations would also be performed in areas targeted by covered conductor (i.e. High Consequence location), however the frequency of inspection or vegetation management would be different, as informed by SCE's Integrated Wildfire Mitigation Strategy and how it is used to prioritize inspections and vegetation management activities.

f) If the answer to part (e) is yes, please explain the difference between the interim mitigations

that SCE performs in areas identified for targeted undergrounding versus Covered Conductor installation.

Please see response to part (e).

g) Are the abovementioned interim mitigations different than those performed in areas where neither Covered Conductor installation nor undergrounding is planned?

The interim mitigations would also be performed in areas neither planned for covered conductor or undergrounding (i.e., Other HFRA location), however the frequency of inspection or vegetation management would be different, as informed by SCE's Integrated Wildfire Mitigation Strategy and how it is used to prioritize inspections and vegetation management activities.

h) If the answer to subpart (g) is yes, please explain the difference between SCE's suite of interim mitigations in areas targeted for undergrounding versus the mitigations SCE performs in areas targeted for neither covered conductor installation nor undergrounding.

Please see response to part (g).