

Southern California Edison

WSD-011 – Resolution implementing the requirements of Public Utilities Code Sections 8389(d)(1), (2) and (4) related to catastrophic wildfire caused by electrical corporations subject to the Commission’s regulatory authority

DATA REQUEST SET T U R N - S C E - 0 0 2

To: TURN

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Received Date: 2/19/2021

Response Date: 2/24/2021

Question 002:

Re SCE Excel data attachment, Table 12, initiative 7.3.3.6 (Distribution pole replacement):

a. The table specifies that if an alternative unit is used, “still required to report line miles,” but SCE did not report line miles for this initiative. If possible, please provide the number in line miles actual and projected for each year 2020-2022.

b. Please explain how SCE converts from “# of pole remediations” to “line miles.” Provide a sample calculation. Provide an estimate of the standard of deviation if there is variance.

Response to Question 002:

- a. SCE reported the counts of poles remediated as an alternative unit because line miles are not an applicable measurement for pole remediations. Pole remediations represents a replacement of a single asset, which is a single point, versus a distance which is typically measured by circuit or line miles.
- b. The WSD defines circuit miles and line miles as follows:¹
- Circuit Miles: The total length in miles of separate circuits regardless of the number of conductors used per circuit
 - Line Miles: The number of miles of transmission and/or distribution line. Differs from “circuit miles” because individual circuits, such as the two circuits of a double-circuit line, are not counted separately in circuit miles but are counted as separate total miles of line.

SCE found the definitions for “Circuit Miles” and “Line Miles” to be in conflict. The definition for circuit miles specifically states “the total length of *separate* circuits,” while the last portion of the definition for line miles states “as the two circuits of a double-circuit line, are not counted separately in circuit miles but are counted as separate total miles of line.” The former states the length is counted for each circuit (even if circuits run along the same path), while the latter does not count the lengths when circuits run along the same path for a circuit mile.

¹ Wildfire Safety Division (November 2020). Resolution WSD-011 – Attachment 2.2: 2021 Wildfire Mitigation Plan (WMP) Guidelines Template, retrieved February 23, 2020 from <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M352/K460/352460864.pdf>

Due to this conflict, SCE used its definition for circuit versus line miles:

- Circuit Miles are the total linear miles considering all circuits along the path of reconductor.
- Line Miles are the linear path of reconductor as a distance from point A to point B regardless of the number of circuits.

While SCE does not believe reporting pole remediations in line miles is applicable, under SCE's definition, the process to convert pole remediations to line miles would be overly burdensome.

The process would consist of two parts:

1. Translate the pole remediation into circuit miles; and
2. Verify all portions of circuit miles where there are multiple circuits running along the same path, in order to ensure the length is only counted once in the line mile calculation.

The first step of translating the data to circuit miles can be completed by the following equation:

- **# poles remediated \times average span lengths between poles**

Where the average span lengths will be calculated using asset data counts and GIS circuit mileage information.

Currently, the second step would require an extensive manual process due to current limitations of GIS data. This manual process would involve mapping each asset to circuits to which the asset is connected and verifying the locations where multiple circuits run along the same path.