

*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 W S D - S C E - 0 0 4**

**To: WSD**

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**Response Date: 3/16/2021**

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**Question 011:**

For Capability 41a of the 2021 Maturity Survey, SCE selected “Accurate RSE estimates for all initiatives are used to determine capital allocation within categories only (e.g., to choose the best vegetation management initiative)” for the year 2021. In Table 12 of its WMP, SCE reported 11 initiatives that have positive capital costs but no RSE estimations. These initiatives are listed below in Table Q11. For each initiative in Table Q11:

11(a). Provide the RSE values for the 11 initiatives that contribute to capital costs.

11(b). For each initiative that (a) cannot be completed, identify the missing variables necessary to complete the RSE calculations, detail the plan to obtain the necessary variables, and the timeline for completion.

**Response to Question 011:**

(a) SCE did not calculate RSEs for the WMP activities and non-WMP programs in the table provided. Please see response to question (b) below. As discussed in Chapter 4 of SCE’s 2021 WMP Update, SCE calculates wildfire risk based RSEs and uses risk analysis to assess all WMP activities and drive work prioritization for (1) activities which were initiated to mitigate wildfire risks *and* (2) which are expected to directly reduce probability or consequence of ignitions. WSD required discussion of several utility programs that SCE did not initiate to mitigate wildfire risks. SCE has performed these programs prior to the initiation of WMP submittals, and though they may have some wildfire mitigation benefits, wildfire mitigation was not the primary driver to undertake these programs. Therefore, SCE does not categorize these as WMP activities and have not systematically completed RSE calculations for these programs. In addition, there are WMP activities that are foundational or supporting activities, such as technology projects, which by themselves do not reduce wildfire risks. However, they help other activities to deliver the expected RSE. Calculating RSEs for these would be speculative at best and un-informative. Calculating RSE’s for activities that are “enabling” or have indirect impacts are not meaningful as these activities do not target specific risk drivers (e.g. Contact from Object-Animal, etc.) – this is a specific requirement in order to calculate an effective RSE.

Additionally, in SCE’s Maturity Survey Response Overview (submitted in last year’s 2020-2022 WMP), SCE further clarified that though RSE calculations are an important input into the capital allocation process, SCE considers other inputs as well such as certain operational

realities, resource constraints, work management efficiencies and other regulatory compliance that must be considered as part of its plan. For example, SCE might undertake an activity even if it has low RSE as it is a relatively low-cost alternative that addresses a specific risk driver that needs to be mitigated.

Accordingly, SCE calculated RSEs for those activities that have a direct impact on probability and consequence of ignition or de-energization or are SCE WMP activities.

SCE has added an extra column to the table provided by the WSD, including page number reference and the description given in SCE's 2021 WMP Update filing. For the reasons discussed above, there is no plan to calculate RSEs for these initiatives.

*Table Q11*

<b>Initiative</b>	<b>WMP Section</b>	<b>SCE's WMP Reference</b>
Advanced weather monitoring and weather stations	7.3.2.1	This activity does not directly mitigate wildfire or PSPS risk.  Pg. 193 – "SCE did not develop an RSE for this enabling activity as it does not directly reduce wildfire or PSPS risk or consequence. Rather, weather stations enable more effective execution of other wildfire mitigation activities, and the RSE calculations for those activities in the future will reflect the benefits of having weather stations."
Weather forecasting and estimating impacts on electrical lines and equipment	7.3.2.6.1	This activity does not directly mitigate wildfire or PSPS risk.  Pg. 204 – "SCE did not develop an RSE for this enabling activity as it does not directly reduce wildfire or PSPS risk or consequence. Rather, this activity enables more effective execution of other wildfire mitigation activities, and the RSE calculations for those activities in the future will reflect these benefits."
Capacitor maintenance and replacement program	7.3.3.1	This is not a SCE WMP activity.  Pg. 208 – "Since capacitor maintenance and replacement activities are not driven by wildfire or PSPS risk reduction, but rather performed as part of

		traditional programs, program selection and design was not driven by risk analysis or RSE calculations.”
Distribution pole replacement and reinforcement, including with composite poles	7.3.3.6	<p>This activity is merged into SH-1 (Covered Conductor Program).</p> <p>Pg. 215 – “In SCE’s 2021 WMP, the WCCP Fire Resistant Poles (FRP) activity is merged with the Covered Conductor program (SH-1), as covered conductor scope determines when new FRP installations are required. Please refer to Section 7.3.3.3 for additional details.”</p>
Pole loading infrastructure hardening and replacement program based on pole loading assessment program	7.3.3.13	<p>This is not a SCE WMP activity.</p> <p>Pg. 222 – “Pole replacements based on pole loading assessments are conducted as part of SCE’s PLP described in Section 7.3.4 - Asset Management &amp; Inspections. Please see Section 7.3.4.13 (Pole loading assessment program to determine safety factor) for further details on SCE’s PLP assessments and remediations.”</p>
Transformers maintenance and replacement	7.3.3.14	<p>This activity is part of High Fire Risk Informed Inspections and Remediations and/or part of the Wildfire Covered Conductor Program.</p> <p>Pg. 223 – “SCE does not have a separate transformer maintenance and replacement program as a WMP initiative. Transformers are inspected and repaired or replaced based on inspection findings as part of overhead detailed inspection outside HFRA and as part of HFRI inspections in HFRA (see Section 7.3.4.10.1). Transformers are also replaced as part of pole replacements (e.g., Deteriorated Pole Replacement and PLP). .....To the extent transformer replacements are performed as part of other activities for which RSEs have been calculated (such as the WCCP), the benefits and costs are included in those calculations.”</p>
Improvement of inspections (asset)	7.3.4.3	<p>This activity does not directly mitigate wildfire or PSPS risk.</p> <p>Pg. 233 – “These are technology solutions which alone</p>

		cannot reduce wildfire or PSPS risks but can improve the efficacy and efficiency of HFRI inspections and remediations, which does have its own RSE.”
Vegetation inventory system	7.3.5.19	<p>This activity does not directly mitigate wildfire or PSPS risk.</p> <p>Pg. 279 – “SCE did not develop an RSE for this enabling activity as it does not directly reduce wildfire or PSPS risk or consequence. Rather, this activity enables more effective execution of other wildfire mitigation activities, and the RSE calculations for those activities in the future will reflect these benefits.”</p>
Centralized repository for data	7.3.7.1	<p>This activity does not directly mitigate wildfire or PSPS risk.</p> <p>Pg. 300 – “SCE did not develop an RSE for WiSDM or Ezy Data because they do not directly mitigate the risk of wildfire or PSPS. Rather they provide capabilities required for various activities that reduce the risk or consequence of wildfire or PSPS as envisioned in the WSD’s Wildfire Mitigation Capability Maturity Model and help inform how other risk mitigation activities are selected and deployed.”</p>
Alternative Technologies	7.1.D	<p>The purpose of Alternative technologies is to assess the efficacy of the activity and to determine whether a targeted or full-scale deployment should occur.</p> <p>Pg. 170 – “Because these technology pilots and applications need to complete the steps identified above prior to SCE determining whether a targeted or full-scale deployment of an activity should occur, it is premature to develop an RSE calculation. Upon conclusion of technology pilot and application activities, if the results are favorable, SCE will use the gathered data to estimate the risk reduction of the mitigation and perform the RSE calculation as part of the analysis to inform a decision for broader deployment of the activity.”</p>