

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 9

To: TURN

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Job Title: Senior Attorney

Received Date: 3/18/2021

Response Date: 3/23/2021

Question 001:

In SCE Response to TURN-SCE-006, Question 006, SCE stated “the covered conductor program unit costs in the 2021 WMP included Fire Resistant Poles, whereas those costs were accounted for separately in SCE’s 2021 GRC unit costs.”

- a. Please disaggregate the 2021 WMP unit cost per circuit mile to isolate the Fire Resistant Pole incremental cost over wood poles used in the 2021 WMP unit cost per circuit mile. In other words, what is the recorded cost of covered conductor (\$/circuit mile) if SCE had installed wooden poles instead of “fire resistant” poles. Please provide all workpapers and assumptions.
- b. Is the Fire Resistant Pole cost identified in subpart (a) above the same as the cost for Fire Resistant Poles relied on when developing the 2021 GRC?
- c. If the answer to subpart (b) is no, please identify the Fire Resistant Pole cost relied on in the 2021 GRC request?
- d. If the answer to subpart (b) is no, please explain the reason for difference between the two forecasts.

Response to Question 001:

SCE objects to this question on the following grounds: (1) the question seeks general rate case/cost recovery information that is outside the scope of this proceeding under Public Utilities Code Sections 8386 & 8386.4(b)(1); (2) the question seeks information not relevant to evaluation of SCE’s Wildfire Mitigation Plan; (3) the question seeks information not reasonably likely to lead to WMP comments that would be appropriate under Public Utilities Code Section 8386(d); (4) the question seeks information that is not readily available and would be unduly burdensome for SCE to assemble and provide; and (5) there is no support for this question under Resolution WSD-001 or the “Wildfire Safety Division Guidance on Resolution WSD-001 and Data Request Best Practices” (January 29, 2021). Based on the foregoing, SCE does not intend to provide a substantive response to this question.