

Southern California Edison
2023-WMPs – 2023-WMPs

DATA REQUEST SET Cal Advocates - SCE - 2023 WMP - 08

To: Cal Advocates
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Response Date: 4/10/2023

Question 08:

Referring to section 7.1.3 Risk-Informed Prioritization, Table 7-2, on p.189 of your WMP, SCE states that, "Below [in table 7-2] is SCE's list that identifies, describes, and prioritizes areas of its service territory at risk from wildfire for potential mitigation initiatives based solely on overall utility risk, including the associated risk drivers."

- a) Why is the overall utility risk higher in High Consequence Areas (HCA) compared to Severe Risk Areas (SRA), despite the higher risk per HFRA mile in SRA?
- b) How does SCE plan to allocate resources for mitigation initiatives across SRA and HCA areas, considering the narrow margin of difference in risk per HFRA mile and the current status of hardened miles in each area?
- c) How does SCE plan to monitor and adapt its prioritization of areas as new data becomes available or as the risk landscape evolves?

Response to Question 08:

Please note that SCE has submitted an errata to OEIS that include corrections to Table 7-2 on 4/6/2023. SCE has shown the changes below for ease of review.

Table 7-2 - List of Prioritized Areas in SCE's Service Area Based on Overall Utility Risk

Priority	Area/ Tranche	Description ¹¹⁰	Overall Utility Risk ¹¹¹	Associated Risk Drivers
1	Severe Risk Areas	Locations with egress challenges, areas that fires have historically propagated towards (burn-in buffer), CEFCs, areas with extreme high winds, and segments with extreme Technosylva consequence (i.e., greater than 10,000 acres in eight hours with simulated wildfire ignition consequence). ~1,520 of ~ 2,925 2,950 total miles already hardened*	52.08 (0.019 risk per HFRA mile) 52.41 (0.021 risk per HFRA mile)	<ul style="list-style-type: none"> • EFF • CFO Other • CFO Veg
2	High Consequence Areas	Segments not identified as a Severe Risk Areas are and in which simulated wildfire ignitions resulted in a wildfire consequence of 300-acres-or greater	64.85 (0.016 risk per HFRA mile)	<ul style="list-style-type: none"> • EFF • CFO Other • CFO Veg

¹¹⁰ Hardened miles as of 12/31/2022 for all risk tranches. SCE may revise this data to reflect adjustments based on comparing completed work orders to mapping data, and also pending completion of SCE's Review & Revise stage of IWMS.

¹¹¹ MARS units as of January 2023. Reflects mitigations and hardening in place.

Priority	Area/ Tranche	Description ¹¹⁰	Overall Utility Risk ¹¹¹	Associated Risk Drivers
		in eight hours, as well as those circuits which have the potential to be frequently impacted by PSPS events. ~2,285 of ~ 4,275 4,400 total miles already hardened*	64.86 (0.017 risk per HFRA mile)	
3	Other HFRA	Encompasses SCE overhead distribution lines that are located in HFRA but that are neither High Consequence Areas nor Severe Risk Areas. ~605 of ~ 2,400 2,250 total miles already hardened*	6.37 (0.003 risk per HFRA mile) 6.03 (0.003 risk per HFRA mile)	<ul style="list-style-type: none"> • EFF • CFO Other • CFO Veg

a) Why is the overall utility risk higher in High Consequence Areas (HCA) compared to Severe Risk Areas (SRA), despite the higher risk per HFRA mile in SRA?

The High Consequence Areas (HCA) have a higher overall utility risk because there are more total miles (4,400 compared to 2,950 in Severe Risk Areas), and more unhardened miles in HCA (2,115 compared to 1,430 in SRA). The overall utility risk is based on risk remaining given mitigations in place and risk remaining on unhardened miles.

b) How does SCE plan to allocate resources for mitigation initiatives across SRA and HCA areas, considering the narrow margin of difference in risk per HFRA mile and the current status of hardened miles in each area?

SCE prioritized mitigations based on the Integrated Wildfire Mitigation Strategy (IWMS) framework. As described in Section 7.1.4.2, SCE designs portfolios of mitigations tailored to each of the three risk areas (Severe Risk Areas, High Consequence Areas, and Other HFRA), with preferred mitigations for each of the three risk areas. For example, in the SRA, SCE's preferred mitigation is either to perform undergrounding if feasible, or to deploy a combination of REFCL and Covered Conductor ++.

As further discussed in Section 7.1.4.3 (page 209), SCE's "guiding principle in scheduling mitigation initiatives is to prioritize work to reduce wildfire risk as expeditiously and efficiently as possible."

c) How does SCE plan to monitor and adapt its prioritization of areas as new data becomes available or as the risk landscape evolves?

If there are major changes to risk framework or risk data, SCE will perform a review of scope under consideration and will make proactive changes to align with new data, if feasible. Please also see the response to Question 2 regarding evaluation of the IWMS Risk Framework.

As an example of reviewing scope, SCE described the IWMS Risk Framework on Section 6.2.1.2, which was a shift from prior risk methodology. As SCE described on page 102:

"In early 2022, SCE reviewed in-flight covered conductor scope for 2022 and 2023 that was still in earlier stages for alignment to the IWMS Risk Framework. Based on those reviews, SCE made decisions to either continue the mitigation as-is, target for higher risk mitigation activity, or stop scope completely.

"SCE also evaluated the alignment of IWMS with the High-Fire Risk Informed (HFRI) detailed inspection scope strategy and has prioritized structures in Severe Risk Areas and High Consequence Areas to be inspected more frequently starting with 2023 inspections.

“Similar alignment was also assessed in 2022 for vegetation management program strategy, such as with the Heavy Tree Mitigation Program (HTMP), where the risk methodology utilized assigned vegetation grids that had higher proportions in Severe Risk Areas to be placed on annual inspection cycles.”

SCE also describes the review performed by SMEs in Section 7.1.4.2 (page 208):

“... the Review and Revise stage consists of the team of SMEs reviewing unhardened segments and local conditions to determine if the segments were appropriately categorized during the Initial Risk Categorization stage. SCE leverages this evaluation process to make individualized adjustments to mitigation portfolios for specific segments if local conditions make an alternative mitigation more appropriate. For example, if a long line of overhead conductor runs through a Severe Risk Area and serves what appears to be relatively small load, the team may recommend a Remote Grid option be evaluated in lieu of undergrounding. Or if the overhead line passes through a region filled with heavy trees and the terrain appears difficult to underground, the team may recommend the evaluation of spacer cable or the combination of covered conductor and REFCL. Further if during a feasibility review, if the mitigation is considered infeasible in a specific location due to local conditions, the Review and Revise team will recommend an alternative mitigation.”