

*Southern California Edison*  
*2023-WMPs – 2023-WMPs*

**DATA REQUEST SET Cal Advocates - SCE - 2023 WMP - 10**

**To: Cal Advocates**  
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**Received Date: 4/11/2023**

**Response Date: 4/14/2023**

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**Question 04:**

Regarding Table 9-02 (Frequently De-energized Circuits), on WMP Appendix F (p. 859-869), for the following entries: 33, 45, 50, 53

- a) These entries state that SCE will “implement operational protocol for portions of the circuit.” Please describe this operational protocol.
- b) Please elaborate on how implementing operational protocols will reduce impact or need for future PSPS events.
- c) Will the referenced operational threshold only work (i.e., reduce the need for or impact of PSPS events) for certain scenarios or all PSPS events going forward?
- d) For each of these four circuits, please state the number of customers who will be affected when SCE implements the operational protocols.
- e) On each of these four circuits, the number of customers who have been affected in some PSPS events is nearly as large or larger than the current number of customers served by the circuit. Why will the operational protocols affect only “portions of” each circuit?

**Response to Question 04:**

- a) *These entries state that SCE will “implement operational protocol for portions of the circuit.” Please describe this operational protocol.*

This operational protocol refers to SCE’s circuit exception process. SCE raises PSPS wind speed thresholds or removes circuit segments from PSPS consideration altogether in situations where persistent or prevalent wildfire risk associated with these segments are temporarily abated or no longer exist, through a circuit exception process. While the potential for reducing PSPS based on circuit exceptions is much more limited than grid hardening activities, the exception process does not require installation or replacement of assets and, therefore, analysis and application of this option can typically be performed quicker than grid hardening activities when the latest information supports such exceptions. The circuit exception review process begins when SCE personnel identify a line segment which—despite being located in HFRA—might currently pose a very low risk for wildfire ignition or fire spread. For example, a portion of a circuit found to be traversing over a recent burn scar may be a candidate for circuit exception. Circuit segments can be identified as candidates for exception review as SCE begins preparing detailed designs for grid hardening activities, or through specific feedback received from field personnel. This process requires current and local knowledge of changing conditions to inform

the circuit review process. Identified circuit segments are reviewed by SCE's PSPS operations, fire science, and risk management experts evaluating the circuit segment's unique characteristics (e.g., construction type, outage history) and location characteristics (e.g., fuel quantity, fuel type, fuel dryness, fuel age, history of fires in the area) to determine if that circuit segment can have raised thresholds despite not being fully covered, or if it can be exempt from PSPS monitoring and de-energization due to low wildfire risk.

- b) *Please elaborate on how implementing operational protocols will reduce impact or need for future PSPS events.*

Details of the circuit exception for each requested circuit are listed below:

- Hillfield: Raised de-energization thresholds on the entire circuit to 40 mph sustained winds or 58 mph wind gusts for 2,372 customers.
- Racer: Raised de-energization thresholds on part of the circuit to 40 mph sustained winds or 58 mph wind gusts for 550 customers.
- Sand Canyon: Raised de-energization thresholds on the entire circuit to 40 mph sustained winds or 58 mph wind gusts for 2,205 customers.
- Sutt: This circuit was reviewed, but not granted an approved exception to have increased de-energization thresholds due to the circuit's close proximity to heavy wildland fuels.

- c) *Will the referenced operational threshold only work (i.e., reduce the need for or impact of PSPS events) for certain scenarios or all PSPS events going forward?*

These thresholds will generally apply to all PSPS events, subject to an annual review to ensure that conditions still support the exception.

- d) *For each of these four circuits, please state the number of customers who will be affected when SCE implements the operational protocols.*

Please see part b above for details for each circuit.

- e) *On each of these four circuits, the number of customers who have been affected in some PSPS events is nearly as large or larger than the current number of customers served by the circuit. Why will the operational protocols affect only "portions of" each circuit?*

Exceptions typically only apply to portions of a circuit since environmental and fuel conditions, and therefore wildfire risk, differ across the entirety of a circuit. For example, one segment of a circuit may traverse a completely developed area like an asphalt parking lot or industrial complex, while other segments may continue into areas with heavy vegetation. Lastly, the quantity and location of switches, together with the unique fuel, weather, and grid connectivity conditions, ultimately drive whether and how exceptions are used during each event.