

*Southern California Edison*  
*2023-UPS – 2023-UPS*

**DATA REQUEST SET ES-D R - E U P - 2 4 - 0 4**

**To: Energy Safety**  
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**Job Title: Senior Advisor**  
**Received Date: 7/5/2024**

**Response Date: 7/15/2024**

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**Question 03. a-h:**

Please provide information requested as it pertains to SCE subprojects.

- a. Based on SCE’s February 13, 2024 DR-EUP-24-01 response, “sub-projects” are established in the Project Initiation Form (PIF) in the initiation phase of SCE’s Timeline of Undergrounding Work . For the purposes of this program, is there a requirement that every subproject consists of line undergrounding or an alternative mitigation? Is it possible that a subproject would only include line maintenance, equipment replacement, or other line improvements that may not, by themselves, be considered a wildfire mitigation alternative?
- b. Would all undergrounding work within a project, one isolatable circuit segment, be consolidated into a single subproject, or could there be multiple undergrounding subprojects within a single circuit segment?
- c. Would a subproject always consist of one contiguous line segment, or could a subproject include multiple, disconnected sections? For example, could one subproject consist of covered conductor installation on miles 2-3, and miles 6-7 of a circuit segment?
- d. In a subproject, which has a continuous section to be undergrounded, would it be likely (or even possible) that this continuous undergrounded section would be broken into subproject(s)? If so, is there a minimum or maximum length of the subproject?
- e. In a “hybrid project,” which has discontinuous sections to be undergrounded, would each of the discontinuous undergrounded portions always be recorded as a separate subproject?
- f. Would there be cases where “hybrid projects” would be created? For example, could one subproject have 4 miles of undergrounding and 1 mile of covered conductor on a 10-mile circuit? Alternatively, would this hypothetical project be split into multiple subprojects based on mitigation type?
- g. Provide details on how risk apportioning is handled for a project with multiple mitigation types. Is the apportionment assigned before or after normalization? Does SCE combine the risk reduction and reliability improvements for each mitigation separately from each other? Can SCE provide normalized values per mile for each mitigation before blending into overall circuit segment values?
- h. Does SCE anticipate any problems with reporting the subprojects with respect to the Cost-Benefit Analysis defined through CPUC proceeding R.20-07-013?

**Response to Question 03. a-h:**

- a. SCE notes that its response to DR-EUP-24-01 does not reference sub-projects and we apologize for any confusion caused. In common practice, SCE develops a Project Initiation Form (PIF) for one type of mitigation (e.g., undergrounding or covered conductor, etc.). The

PIF could be broken up into smaller work orders (TDs), which may be similar to what is described as “sub-projects”. Typically, those TDs in the same PIF will be one type of mitigation.

- b. See Q03.a.
- c. See Q03.a.
- d. See Q03.a.
- e. See Q03.a.
- f. See Q03.a.
- g. See Q03.a.
- h. See Q03.a.