

(U 338-E)

Southern California Edison Q3 2024 Quarterly Data Report

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I. INTRODUCTION

Pursuant to the Office of Energy Infrastructure Safety's (OEIS, or Energy Safety) Final Data Guidelines v3.2 that were adopted on January 30, 2024 (Data Guidelines), this Q3 2024 Quarterly Data Report (QDR) includes Southern California Edison Company's (SCE) (1) Geographic Information System (GIS) geodatabase v3.2 and the related Spatial Status Report v3.2, in Excel, that further denotes what spatial data SCE is providing at this time; (2) Wildfire Mitigation Data Tables, in Excel, pursuant to Energy Safety's Wildfire Mitigation Data Table template for Tables 1-15 v3.2; and (3) a description of the data included in the GIS database and Wildfire Mitigation Data Tables.

SCE appreciates Energy Safety's acknowledgment that utilities are at various stages of their data journey and that the Data Guidelines is intended to be a phased approach including ongoing changes to the GIS schema. SCE is committed to providing more data and details with each successive QDR submission. The confidential geodatabase is being submitted directly to Energy Safety. Pursuant to the California Code of Regulations, Title 14, Division 17, Chapter 1, Article 3, Section 29200, SCE has attached its application for confidential designation of the data provided within the Q3 2024 QDR.

At this time SCE will not be resubmitting any prior QDR's for 2024 as we are still in the process of identifying these changes in our data as well as the best approach to provide these updates to Energy Safety. SCE appreciates Energy Safety's understanding as we update our internal QDR processes to better align with the requirements set out in Data Guidelines v3.2 Section 2.4.

II. GEOSPATIAL DATA

Based on the Data Guidelines, this QDR provides recorded GIS data for the July through September 2024 period and planned GIS data for the following month, where available.

SCE has identified the following items to provide additional clarity on some activities:

- Planned work for Q3 2024 will not include geometry information as the data is not yet available in source systems
- HFTDClass will reflect null if location is not mapped in SCE's system of record at the time of filing; this is to prevent confusion as previously SCE categorized structures as being in Non-HFTD until system of record was updated
- SH-1 Cover Conductor
 - All structures related to the work order design for cover conductor installations are included in the QDR reported data
- SH-2 Targeted Underground
 - In Q3, SCE completed removal of 0.39 overhead miles in support of targeted underground in HFRA which will be counted toward 2023 target (note: the first 5.61 miles removed in 2024 will count toward 2023 target due to missed target)
- Vegetation Management Inspections (VM-1, VM-4, VM-7 & VM-8)
 - Cumulative total will not match Q3 completed work, because per SCE 2023-2025
 Wildfire Mitigation Plan Table 8-15 Vegetation Inspection Targets, inspections can occur as early as November 1 in the prior year. Per Data Guidelines, only work completed in Q3 is being reported in the QDR
- VM-2 Inspections Structure Brushing and VM-2 Projects Structure Brushing
 - Currently, 39 records are marked as on-HFTD because they were in HFTD during the scoping phase, and therefore, the work has been completed
- 7 grids for VM-4 Inspections Distribution Dead and Dying and 5 grids for VM-7 Inspections Distribution Expanded Clearances are reported in District 50 (Shaver Lake) are mislabeled as Non-HFTD and show missing geometry due to how vegetation management work is tracked in Shaver Lake. These grids have been evaluated and are confirmed to be in HFTD
- VM-7 Projects Distribution Expanded Clearances
 - 6 records are listed as non-HFTD; however, it has been verified that the grid to which these trees belong falls within HFTD

No data has been provided for the following activity as no work/installations or events were completed or occurred in Q3 2024:

- Other Power Line Connections: There are no changes from what was provided to OEIS in the Q1 submission
- PSPS Damage related data sets (there was no recorded damage due to PSPS activations in Q3)
- Please see the GIS Status Report for a list of other data sets not included in this QDR

This QDR includes the geospatial Initiative,¹ Asset Point, Asset Line, PSPS and Risk Events, and Other Required Data datasets.

SCE appreciates that Energy Safety, through its comprehensive, updated Data Guidelines, intends to obtain and standardize significant amounts of wildfire-related data. SCE also understands Energy Safety's desire to understand our current systems and data availability. To this end, SCE also provides updated responses in the Status Report in the Excel file template that generally describe the status of the requested data fields, actions we plan to take if a particular data field is not being provided at this time, the timeline for completing those actions, and whether the data is confidential. SCE describes its approach to the updated Status Report.

SCE also notes that it does not capture several data elements that still require time for our teams and subject matter experts to assess with respect to the labor, operational, system and technical requirements. Where available, SCE provides more details of our submission at the Feature Class level within the accompanying GIS Status Report. While SCE understands that Energy Safety desires specific timelines to address all data gaps, we are not able to provide all assessments with this QDR submission.

Like its previous QDR, SCE is providing the requested spatial data in the geodatabase. Additionally, SCE is submitting an updated Status Report based on the datasets described above. SCE notes that it continues to take a phased approach to improve the data being provided. SCE looks forward to continued collaboration with Energy Safety, utilities, and other stakeholders to refine and improve the Data Guidelines.

III. WILDFIRE MITIGATION DATA TABLES 1-15

Introduction:

SCE provides Wildfire Mitigation Data Tables 1-15 pursuant to the requirements in the Data Guidelines. Where applicable, SCE includes revisions to historical data where inputs may have changed over time as identified through discovery and/or further quality review of the calculations and data.

¹ The Initiative dataset includes grid hardening, vegetation management (projects & inspections), and asset inspections initiatives where work was performed and/or projected to be performed in HFRA over the reporting periods.

The information provided in conjunction with ignition events and "utility-ignited" wildfire statistics in Tables 1-15 should not be construed as an admission of any wrongdoing or liability by SCE. SCE further notes that the damages metrics provided may be tracked by other agencies and thus, SCE does not guarantee the accuracy of such information. Additionally, in many instances the cause of wildfires is still under investigation and even where an Authority Having Jurisdiction (AHJ) has issued a report on the cause, SCE may dispute the conclusions of such report.

In some tables, the Data Guidelines require electrical corporations to provide projections for future projected unit counts, risk events, customer impacts, etc., over the 2023–2025 period. SCE notes that these projections are subject to change and represent an estimation of potential future scenarios. Several factors, such as weather and third-party response, can impact the actual performance. These projections are not part of SCE's WMP initiative targets and should not be included in the scope of compliance review.

SCE provides data for all Wildfire Mitigation Data Tables and is also including additional information for some of the tables to provide further clarification:

Table 1: Quarterly Initiative Update (QIU)

SCE notes that Targets are described in several documents including the Quarterly Data Report and throughout the 2023-2025 WMP. While SCE has made efforts to align the language and numerical values across these locations, in the case of discrepancies, SCE's intention is for Tables 1 and 12 to serve as the authoritative and governing source for the Targets. For Table 1 actuals, SCE notes that the current quarter is updated, and no revisions are made to previous quarters. Totals will align with each quarter's submitted Quarterly Narrative Letter (QNL).

- SH-2 Targeted Underground
 - In Q3, SCE completed removal of 0.39 overhead miles in support of targeted underground in HFRA which will be counted toward 2023 target (note: the first 5.61 miles removed in 2024 will count toward 2023 target due to missed target)

Table 2: Performance Metrics

• Time Between Inspection and Resulting Remediation:

SCE interprets these data points to include only closed work orders (notifications) that were completed on Jan. 1, 2020, or later and identified through an overhead inspection program (e.g., risk-informed ground inspection, aerial, etc.) regardless of date that the finding was identified. Included in this calculation are work orders that have been subject to external constraints such as permitting, access constraints, and/or long lead time environmental clearances that may have extended the remediation time. Furthermore, work orders identified as a Level 1 condition (i.e., Priority 1) are emergent and made safe for the public within 24 hours. The resulting permanent repair may extend longer due to material availability, customer access, and/or local permitting requirements.

• Time Between Vegetation Inspection Finding and Resulting Trimming Activity: As of the Q1 2024 submission SCE is now providing these metrics in hours. Prior to Q1 2024, SCE provided these metrics in days. Therefore, an increase in overall timing historical trends will be noticed.

• Asset / Vegetation Management Open and Past-Due Work Orders

SCE provides open and past-due work orders (notifications) counts as a snapshot in time at the end of each quarter. These figures include work orders that may have been constrained due to external factors that are outside of SCE's control (e.g., permitting and customer access) and include only work identified through inspection programs.

Asset management work orders are defined as past-due when the repair has not been completed by the GO 95 specified compliance timeframes or SCE's internal due date, whichever is sooner.

Vegetation management work orders are defined as past-due based on the clearance distances at time of inspection as recommended by GO 95, Rule 35, when the required trimming activity has not been completed by SCE's prescribed internal timeframes:

- **30 Days:** Trees with clearances less than the Regulation Clearance Distance (RCD)
- **90 Days**: Trees with clearances less than the RCD and are less than or equal to the Trigger Clearance Distance (TCD)

• Asset Management WO/Past Due Projections:

For metrics 6a, 6b, 7a, and 7b, 2023 projections are based on the average of the quarter-end recorded counts from 2020-2022. SCE used 2023 as the basis for its 2024 and 2025 projections, due to the variability in work orders anticipated in those years. For example, while SCE is committed to actively working down its open and past due work orders over time, in 2024, assets governed by Priority 3 inspection timelines will become due for the first time. It is difficult to project volumes of future open work order counts when there is no historical data to show how the influx of Priority 3 notifications may impact workflow. As discussed in SCE's 2023-2025 WMP, SCE is focused on prioritizing the remediation of work orders that have the highest risk first, while also working to reduce overall open and past due work orders over time.

• Circuit Mile Conversion:

SCE accounts for completed inspections by noting the counts of assets inspected instead of noting by circuit miles. To present completed inspections in the requested format, SCE uses a calculated average span length multiplied by the number of structures inspected. Unique span length multipliers are used for Transmission and Distribution and HFRA and Non-HFRA calculations.

• Inspection Methods:

SCE provides counts of structures inspected, circuit miles inspected, grid condition findings and fixes from inspections where applicable. SCE does not differentiate its inspections in its system of record by the exact methods provided by OEIS. For the methods that SCE does not utilize, SCE has provided values in the blank meaning column to account for the null rows.

• Value of assets destroyed by utility-related ignitions:

For metric 10a, SCE has implemented a new methodology to track the component of asset value associated with SCE-owned facilities destroyed by ignitions. SCE will now populate this part of the metric using costs recorded to internal work orders associated with the repair or replacement of assets damaged or destroyed due to ignitions. Please note, due to the timing of work order closings, final cost data may not be available at the time each QDR is published. In these cases, SCE will true-up ignition related costs at each quarterly submission.

• Response Time

For metric 8a, data for crew response time to a locked circuit breaker incident is not readily available for instances not involving hazard conditions such as 911 or wire down calls. SCE will continue to review the available information in its outage systems to provide this information in a future filing. Currently, any quarterly data would reflect only 911 and wire down events and is not a good representation of SCE's overall response time.

• Community Outreach Metrics

For metric 17a, SCE has no jurisdiction over evacuation orders. SCE diligently requested and followed up with local governments and law enforcement and was only able to obtain information from one county. Even then, the information provided included high-level estimations of evacuation counts estimated by the local government and law enforcement entity for a limited number of fires. Because of this, SCE is unable to obtain the requested data, analyze it, and report on evacuation related requirements in this table. SCE anticipates this to be a recurring challenge going forward.

Table 3: List and Description of Additional Metrics

In Table 3, SCE identifies several performance metrics which may be helpful to inform evaluation of the performance of SCE's wildfire mitigation portfolio. SCE identified metrics because WMP activities are designed to reduce wildfire ignitions associated with its electrical infrastructure and reduce the impact of PSPS de-energization events to customers. Importantly, these metrics are within the reasonable control of utilities when appropriately normalized for weather and other exogenous factors. Other metrics such as safety incidents, acres burned or structures destroyed, though important to understand, track, and monitor are impacted by events and circumstances outside of the utility's control such as climate change, droughts, fire suppression efforts and fire response.

Metrics and underlying data are critical components for WMP development, execution, and evaluation, but we continue to emphasize that the near-term focus should be on efficient implementation of our planned activities, while the assessment of whether the activities are having the desired and expected impact on risk reduction should be measured over a longer time horizon. A clear distinction is necessary between initiative targets as outlined in Table 1 that establish goals and monitor compliance with approved WMPs and metrics that evaluate effectiveness of these approved plans and inform future WMP updates. As stated in previous filings and submittals, tracking initiative targets for approved WMPs is the best means of determining progress and assessing WMP compliance in the near-term.

SCE notes that projections provided for its performance metrics are estimates only and subject to change.

Tables 4: Weather Patterns: No additional clarification is needed at this time.

Tables 5 & 6: Risk Event & Ignition Drivers: No additional clarification is needed at this time.

Table 7: State of Service Territory and Utility Equipment: No additional clarification is needed at this time.

Tables 8 Location of Utility Equipment Additions and Removals: No additional clarification is needed at this time.

Tables 9: Location of Infrastructure Upgrades: SCE provides equipment upgrade data where available. In some instances, the exact circuit and/or geospatial locational data and line lengths required are not available at the time of reporting. This is due in part to detailed designs not yet completed for certain infrastructure projects (e.g., detailed design for projects requiring a Permit to Construct or a CPCN from the CPUC do not begin until the Commission approves the project). Where detailed design is available, SCE is working internally to begin incorporating the geospatial data needed to provide these data points for future submissions. Furthermore, projections are subject to change due to operating constraints, design changes in the field, changes in priority, and resource availability.

Table 10: Recent Use of PSPS and Other PSPS Metrics

- Fast-Trip Events and Unplanned Outages Resulting from Fast Trip
 - SCE provides all outages that have occurred while fast-trip settings were enabled. This does not mean that those outages would only have occurred because of fast trip. Sensitive protection settings are designed to activate quickly when a fault is detected by de-energizing a circuit or circuit segment which minimizes the overall fault energy and reduces the probability of ignition. SCE's fast trip settings are enabled during times of increased fire risk (red flag warning, fire weather threat, fire climate zone threat, or thunderstorm threat).

Table 11: Mitigation Initiative Financials: No changes to this data for Q3 and no additional clarification is needed at this time.

Table 12: Mid-Year and End-of-Year Targets

In Table 12, SCE provides mid-year and end-of-year Targets, pursuant to the 2023-2025 WMP Guidelines, for the following WMP activities:

- Asset Inspections
- Vegetation Management
- Stakeholder Coordination (with regards to PSPS)

SCE notes that Targets are described in several documents, including the Quarterly Data Report and throughout the 2023-2025 WMP. While SCE has made efforts to align the language and numerical values across these locations, in the case of discrepancies, SCE's intention is for Tables 1 and 12 to serve as the authoritative and governing source for the Targets.

Table 13: Open Work Orders/Notifications

Due to the volume of information requested by Energy Safety, SCE submits Table 13 data as an Excel file. In Column H, SCE indicates which open work orders are potential ignition risks not constrained by a documented external constraint (i.e., GO 95 exceptions). SCE has also included extra columns at the end of the Table 13 template to provide further detail on the work that needs to be addressed in the WO.

Table 14: HFTD Area Risk Summary

In Table 14, SCE provides information summarizing its HFTD risk. If future changes to this risk analysis result in changes to this table, SCE will update the values in Table 14 as applicable, pursuant to guidance from Energy Safety. No changes for Q3.

SCE also notes that its risk models and analytics are currently focused on the areas of our system that have been designated as having either an elevated or extreme threat of wildfire pursuant to the CPUC's HFTD maps and as such, SCE does not currently calculate the risk values in Table 14 in non-HFTD areas.

Table 15: Top Risk Circuit Scores

In Table 15, SCE provides the calculated value of each risk component by circuit that significantly contributes to risk. Risk scores are updated annually and updates to Table 15 will not reflect each quarter unless changes need to be reflected. No changes for Q3.