Southern California Edison
R.18-10-007 – SB 901

DATA REQUEST SET S E D - S C E - 0 0 3

To: SED
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Response Date: 9/13/2019

Question 01 Supplemental:
For HFRA circuits identified and prioritized in GSRP, will SCE's Wildfire Covered Conductor Program (WCCP) be deploying covered conductor in any areas that have already gone through the Overhead Conductor Program (OCP)? In other words, will WCCP work overlap any OCP completed/in-flight work in 2019?

Response to Question 01 Supplemental:

SCE submits this amended data request response to account for the following two changes: As described in SCE's August 30, 2019 2021 GRC Application (A.19-08-013), traditionally, SCE has defined its HFRA to include both Commission-designed high-threat "Tier" 2 and 3 areas (collectively known as High Fire Threat Districts (HFTD)) as well as non-Commission-designated areas that SCE has historically considered to be at elevated risk of wildfires (Non-Tiered Areas). As required by D.19-05-038, SCE has completed an internal rigorous assessment of its Non-Tiered Areas that determined which subsections of those areas should be retained as HFRA and which should be excluded from HFRA on a going-forward basis. SCE documented those efforts in detail both in its July 5, 2019 Advice Letter 4030-E as well as its August 19, 2019 Petition for Modification (PFM) of D.17-12-024, the latter of which formally requests the Commission make changes to its official HFTD fire maps to include the portion of Non-Tiered Areas SCE proposes to retain as HFRA. SCE's final analysis concluded that a 99% exclusion rate (i.e., a 1% retention rate) was appropriate, and this latter figure is the basis of the pending PFM of D.17-12-024.

As a separate issue, but one that has the same directional effect, the data request response counted the number of HFRA circuit miles using a "roll-up" methodology, which was based on our historical operational practices. SCE has subsequently developed a new HFRA circuit mile

calculation methodology known as the "spatial clip" method, which more precisely counts the exact number of circuit miles that physically reside in each HFRA tier from a geospatial perspective.

Changes to the original data request response are shown in red font and strikethrough.

SCE had a follow-up discussion with SED on March 7, 2019 to clarify this question. This conversation clarified that SCE should focus on 2019 for the SB 901-related part of this question. Particularly, whether WCCP will overlap with completed/in-flight OCP in 2019.

There will be minimal to no overlap between WCCP work and OCP completed/in-flight work. Since the inception of OCP in 2015, SCE has completed a total of 142 circuit miles of OCP projects (as bare conductor) in HFRA. Given the small amount of OCP miles completed in HFRA relative to the approximately ~~13,000~~ 9,800 primary distribution overhead circuit miles, there is limited opportunity for the programs to overlap. The two programs focus on different drivers and generally are associated with different geographic areas. OCP focuses mostly on urban areas with greater populations where the risk of human contact with downed energized conductors is greatest. The risk factors considered are public safety, reliability, property damage, and road closures. WCCP focuses on more rural, heavily-vegetated areas where the consequence of wildfire ignition is greatest. The risk factors considered are public safety and ignition potential.

More importantly, SCE stopped scoping any projects in the HFRA with bare conductor as of Q3 2018 and is proactively assessing projects going through Planning/Design in order to minimize the number of OCP projects that will be constructed with bare conductor in HFRA. Given this, there will be minimal bare conductor OCP project constructed in 2019 in HFRA, the current preliminary estimate is less than 40 circuit miles. Additionally, SCE does not currently plan to re-construct OCP projects that are completed in 2019.