

DATA REQUEST SET MGRA-SCE-001

To: MGRA Prepared by: Andrew Garcia Job Title: Senior Manager Received Date: 3/3/2019

Response Date: 3/6/2019

Question 01: How many individual distribution and transmission circuits have elements within HFTD Tier 2 and Tier 3 (some portion of the circuit passes through HFTD Tier 2 or Tier 3)? Please specify answers for distribution and transmission circuits separately.

Response to Question 01:

SCE has 1,111 distribution circuits and 401 transmission circuits that have elements (i.e., equipment) within Tier 2 and/or Tier 3.

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Response Date: 3/6/2019

Question 02: What is the current average length in miles of the distribution and transmission circuits specified in question MGRA-1? Please specify answers for distribution and transmission circuits separately.

Response to Question 02:

SCE interprets this question to be asking for the average (i.e., mean) length of the portion of the circuits specified in MGRA-1 that fall within Tier 2 and/or Tier 3. Given this interpretation, the current average length of the distribution circuits is approximately 8.9 miles, and the average length of the transmission circuits is approximately 13.7 miles.

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Question 03: What is the current median length in miles of the distribution and transmission circuits specified in question MGRA-1? Please specify answers for distribution and transmission circuits separately.

Response to Question 03:

SCE interprets this question to be asking for the median length of the portion of the circuits specified in MGRA-1 that fall within Tier 2 and/or Tier 3. Given this interpretation, the current median length of the distribution circuits is approximately 3.6 miles, and the median length of the transmission circuits is approximately 6.5 miles.

PACIFIC GAS AND ELECTRIC COMPANY Wildfire Mitigation Plans Rulemaking 18-10-007 Data Response

PG&E Data Request No.:	MGRA_001-Q04		
PG&E File Name:	WildfireMitigationPlans_DR_MGRA_001-Q04		
Request Date:	March 3, 2019	Requester DR No.:	001
Date Sent:	March 7, 2019	Requesting Party:	Mussey Grade Road
			Alliance
PG&E Witness:		Requester:	Joseph W. Mitchell

SUBJECT: THE FIRST SET OF QUESTIONS PERTAINS TO THE LENGTH OF TRANSMISSION AND DISTRIBUTION CIRCUITS IN THE UTILITY HFTD TIER 2 AND TIER 3 TERRITORY AND THE DEGREE TO WHICH THEY CAN BE INDIVIDUALLY MONITORED AND CONTROLLED.

QUESTION 04

What is the current average length in miles of the top 10% longest distribution and transmission circuits specified in question MGRA-1? Please specify answers for distribution and transmission circuits separately.

ANSWER 04

PG&E interprets this question as applying to overhead circuits within PG&E's service area. These answers are subject to change as the system is reconfigured or as lines are constructed or removed.

As of March 6, 2019, the average length of the top 10% longest overhead distribution circuits specified in response to MGRA_001, Q01 is approximately 806,700 feet.

As of March 6, 2019, the average length of the top 10% longest overhead transmission circuits specified in response to MGRA_001, Q01 is approximately 271,700 feet.

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To: MGRA Prepared by: Andrew Garcia Job Title: Senior Manager Received Date: 3/3/2019

Response Date: 3/7/2019

Question 05: How many circuits specified in MGRA-1 are planned for resectionalization into smaller circuit segments in 2019 and 2020 time frame? What will be the average segment length before and after such modifications, if any are planned?

Response to Question 05:

SCE objects to the question because it is beyond the scope of the proceeding. SCE's 2019 Wildfire Mitigation plan is comprised of wildfire mitigation programs and activities SCE plans to undertake in 2019 to reduce wildfire risk. Notwithstanding this objection, SCE responds as follows:

SCE interprets this question on resectionalizing circuits in relation to RARs which provide the capability to sectionalize faulted circuitry and segment circuits related to Public Safety Power Shutoff events. SCE intends to add at least 50 new RARs to SCE HFRA circuitry in 2019, as detailed in WMP Chapter 4.3.3.5: Protection and Isolation. Currently, there are approximately 46 circuits listed in MGRA-1 which have been identified for RAR applications in 2019. These 2019 projects are presently in the design phase. With the existing RARs on these circuits the average segment length is approximately 16 miles, and following the expected 2019 RAR installations the average segment length is expected to be approximately 11 miles.

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To: MGRA Prepared by: Andrew Garcia Job Title: Senior Manager Received Date: 3/3/2019

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Question 06: What are longer term plans for circuit division into smaller segments for the 2020-2025 time frame?

Response to Question 06:

SCE objects to the question because it is beyond the scope of the proceeding. SCE's 2019 Wildfire Mitigation plan is comprised of mitigation and activities SCE plans to undertake in 2019 to reduce wildfire risk. Notwithstanding this objection, SCE responds as follows: At this time, SCE does not have plans in the 2020-2025 timeframe to divide circuits into smaller sections for the purpose of wildfire mitigation.

DATA REQUEST SET MGRA-SCE-001

To: MGRA Prepared by: Andrew Garcia Job Title: Senior Manager Received Date: 3/3/2019

Response Date: 3/7/2019

Question 07: How many of the circuits specified in MGRA-1 can currently be remotely deenergized or re-energized via SCADA? Please specify answers for distribution and transmission circuits separately.

Response to Question 07:

All distribution circuits specified in MGRA-1 can be remotely de-energized and re-energized via SCE's existing SCADA systems. Twenty of the transmission circuits specified in MGRA-1 have at least one terminal without remote capability to be de-energized or re-energized via SCE's existing SCADA systems. Transmission circuits may have more than one source of electricity and operate networked as opposed to radially. As such, all of the associated circuit breakers for each source would need to be opened to de-energize the circuit. Some transmission lines have sources or terminals which are not operated by SCE, where the source or terminal may be a neighboring utility or a generating facility.

DATA REQUEST SET MGRA-SCE-001

To: MGRA Prepared by: Andrew Garcia Job Title: Senior Manager Received Date: 3/3/2019

Response Date: 3/7/2019

Question 08: How many of the circuits specified in MGRA-1 will have capability to be remotely de-energized or re-energized via SCADA after 2019-2020 work is completed? Please specify answers for distribution and transmission circuits separately, and include any new circuits created by sectionalization of existing circuits.

Response to Question 08:

SCE objects to the question because it is beyond the scope of the proceeding. SCE's 2019 Wildfire Mitigation plan is comprised of mitigation and activities SCE plans to undertake in 2019 to reduce wildfire risk. Notwithstanding this objection, SCE responds as follows. All distribution circuits specified in MGRA-1 can be remotely de-energized and re-energized via SCE's existing SCADA systems. After certain 2020 work unrelated to wildfire mitigation is completed, eighteen of the transmission circuits specified in MGRA-1 will have at least one terminal without remote capability to be de-energized or re-energized via SCE's existing SCADA systems. Transmission circuits may have more than one source of electricity and operate networked as opposed to radially. As such, all of the associated circuit breakers for each source would need to be opened to de-energize the circuit. Some transmission lines have sources or terminals which are not operated by SCE, where the source or terminal may be a neighboring utility or a generating facility. SCE has no plans to create new circuits by sectionalizing existing circuits for the purpose of wildfire mitigation at this time.

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To: MGRA Prepared by: Andrew Garcia Job Title: Senior Manager Received Date: 3/3/2019

Response Date: 3/7/2019

Question 09: How many of the circuits specified in MGRA-1 can currently reset recloser settings via SCADA? Please specify answers for distribution and transmission circuits separately.

Response to Question 09:

SCE interprets this question for the ability to "reset recloser settings via SCADA" to be asking whether SCE can remotely control the reclosing relay making it automatic or blocked. Given this interpretation, all distribution circuits specified in MGRA-1 can reset recloser settings via SCE's existing SCADA.

It is important to note that not all transmission circuits have reclose relays due to system stability, and utility intertie concerns. However, twenty of the transmission circuits specified in MGRA-1 that do have reclose relays, have at least one terminal without remote capability to reset recloser settings via SCE's existing SCADA systems. Transmission circuits may have more than one source of electricity and operate networked as opposed to radially. As such, all of the associated circuit breakers for each source would need to be opened to de-energize the circuit. Some transmission lines have sources or terminals which are not operated by SCE, where the source or terminal may be a neighboring utility or a generating facility.

DATA REQUEST SET MGRA-SCE-001

To: MGRA Prepared by: Andrew Garcia Job Title: Senior Manager Received Date: 3/3/2019

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Question 10: How many of the circuits specified in MGRA-1 will have capability to reset recloser settings via SCADA after 2019-2020 work is completed? Please specify answers for distribution and transmission circuits separately, and include any new circuits created by sectionalization of existing circuits.

Response to Question 10:

SCE objects to the question because it is beyond the scope of the proceeding. SCE's 2019 Wildfire Mitigation plan is comprised of mitigation and activities SCE plans to undertake in 2019 to reduce wildfire risk. Notwithstanding this objection, SCE responds as follows.

SCE interprets this question for the "capability to reset recloser settings via SCADA" to be asking whether SCE can remotely control the reclosing relay making it automatic or blocked. Given this interpretation, all distribution circuits specified in MGRA-1 can reset recloser settings via SCE's existing SCADA.

It is important to note that not all transmission circuits have reclose relays due to system stability, and utility intertie concerns. After certain 2020 work unrelated to wildfire mitigation is completed, eighteen of the transmission circuits specified in MGRA-1 that currently have reclose relays will have at least one terminal without remote capability to reset recloser settings via SCE's existing SCADA systems. Transmission circuits may have more than one source of electricity and operate networked as opposed to radially. As such, all of the associated circuit breakers for each source would need to be opened to de-energize the circuit. Some transmission lines have sources or terminals which are not operated by SCE, *e.g.*, where the source or terminal may be a neighboring utility or a generating facility. SCE has no plans to create new circuits by sectionalizing existing circuits for the purpose of wildfire mitigation at this time.

DATA REQUEST SET MGRA-SCE-001

To: MGRA Prepared by: Thomas Brady Job Title: Senior Advisor Received Date: 3/3/2019

Response Date: 3/7/2019

Question 11: How many of the circuits specified in MGRA-1 have a weather station within 1/4 mile of some portion of the circuit? Please specify answers for distribution and transmission circuits separately.

Response to Question 11:

The data stated in this question is current as of 3/5/2019. 91 distribution circuits have a weather station within $\frac{1}{4}$ mile of some portion of the circuit. 35 transmission/subtransmission circuits have a weather station within $\frac{1}{4}$ mile of some portion of the circuit. The number of distribution and transmission circuits that have a weather station within $\frac{1}{4}$ mile of some portion of the circuit. The number of the circuit will increase as wildfire mitigation efforts continue.

DATA REQUEST SET MGRA-SCE-001

To: MGRA Prepared by: Thomas Brady Job Title: Senior Advisor Received Date: 3/3/2019

Response Date: 3/6/2019

Question 12: How many of the circuits specified in MGRA-1 will have a weather station within 1/4 mile of some portion of the circuit after 2019-2020 work is completed? Please specify answers for distribution and transmission circuits separately, and include any new circuits created by sectionalization of existing circuits

Response to Question 12:

SCE objects to the question to the extent it calls for information beyond the scope of SCE's 2019 calendar-year WMP. Notwithstanding the foregoing objection, SCE responds as follows: Please refer to MGRA-SCE-001 Question 11 for the number of distribution and transmission circuits within ¹/₄ mile of some portion of the circuit as of 3/5/2019.

2020 wildfire mitigation activities, including those associated with weather stations, will be considered in the 2020 WMP proceeding, and are not within the scope of this proceeding. At this time, SCE's meteorologists are determining specific weather station locations for future installations. As such, the number of circuits that will have weather stations within ¹/₄ mile at the end of 2020 is still being determined.

The objective of the weather station program is to create a dense network of strategically placed weather stations to cast a comprehensive mesonet that will provide high accuracy, localized weather data for HFRA circuit infrastructure. The current plan will allow for a majority of the circuits within HFRA to have a quality, publicly-available weather station (e.g. SCE, Remote Automated Weather Station (RAWS), or National Weather Service (NWS) weather station) within one mile of the circuit. SCE estimates it will take up to 850 weather stations to achieve this goal.

DATA REQUEST SET MGRA-SCE-001

To: MGRA Prepared by: Peter Lee Job Title: Senior Business Analyst Received Date: 3/3/2019

Response Date: 3/6/2019

Question 13: What tree species are regarded to be "at risk" or "reliability" trees in the utility service area? If this is a long list, restrict to the top ten most likely to be associated with outages.

Response to Question 13:

"At risk" or "reliability" trees are based on the tree's hazard characteristics rather than simply a tree species.

The following tree species have been linked to the largest number of outages associated with SCE utility equipment over the past 3 years:

- 1. Palm Tree
- 2. Eucalyptus
- 3. Pine
- 4. Oak
- 5. Cedar
- 6. Ash
- 7. Sycamore
- 8. Elm
- 9. Cypress
- 10. Ficus

DATA REQUEST SET MGRA-SCE-001

To: MGRA Prepared by: Peter Lee Job Title: Senior Business Analyst Received Date: 3/3/2019

Response Date: 3/7/2019

Question 14: Please give the fraction of total vegetation-caused outages are caused by fall-in of "at risk" or "reliability" tree species, by top ten species if available, averaging over the past five years. Provide the same for vegetation-caused ignitions. Restrict analyses to cases where the tree and all limbs were outside of the 12 foot trim zone. Also provide the total fraction of the same species within the utility tree database if available.

Response to Question 14:

SCE objects to the question as it is overly broad, unduly burdensome, and because it is beyond the scope of this proceeding. SCE's 2019 Wildfire Mitigation Plan (WMP) is comprised of mitigation and activities SCE plans to undertake in 2019 to reduce wildfire risk and historical data from the last five years is in many respects beyond the scope of the WMP. Notwithstanding this objection, SCE responds as follows.

The tables below provide the top 10 tree species that have been associated with outages by fall-in of "at risk" or "reliability" trees from 2016 to 2018 (and is not limited to events from "trees and limbs [that] were outside of the 12 foot trim zone"):

2016		
Interruption		
Palm	290	
Eucalyptus	56	
Pine	49	
Oak	28	
Cedar	19	
Ash	7	
Elm	4	
Ficus	4	
Fir	4	
Sycamore	4	
Total	465	

2017		
Interruption Tree Type Count		
Palm	191	
Eucalyptus	89	
Pine	69	
Oak	47	
Ash	13	
Cedar	13	
Elm	12	
Cypress	8	
Pepper	6	
Athel	5	
Total	453	

2018		
	Interruption	
Tree Type	Count	
Palm	199	
Eucalyptus	46	
Oak	31	
Pine	23	
Elm	8	
Sycamore	7	
Cottonwood	5	
Ash	4	
Fir	4	
Cedar	3	
Total	330	

2016		2017	
TCCI Category	Interruption Count	TCCI Category	Interruption Count
Vegetation Blown	496	Vegetation Blown	477
Vegetation Overgrown	48	Vegetation Overgrown	57
Other	1	Total	534
Total	545		

The tables below provide the number of Tree Caused Circuit Interruptions (TCCI) from 2016 to 2018:

2	2018		
TCCI Category	Interruption Count		
Vegetation Blown	328		
Vegetation Overgrown	83		
Total	411		

**Other – Not Caused by Vegetation

Regarding vegetation-associated ignitions, SCE records fire data in accordance with CPUC Decision 14-02-015, which established the Fire Incident Data Collection Plan for utilities. Pursuant to this decision, SCE Fire Incident Data records are not categorized by tree species nor limited to events from "trees and limbs [that] were outside of the 12 foot trim zone."

DATA REQUEST SET MGRA-SCE-001

To: MGRA Prepared by: Peter Lee Job Title: Senior Business Analyst Received Date: 3/3/2019

Response Date: 3/7/2019

Question 15: Are all trees of "at risk" or "reliability" species within the "strike zone" of utility equipment planned for trimming or removal? If arborist discretion is to be used, what factors will be used to determine which trees will be trimmed or removed, and what approximate fraction of "at risk" or "reliability" tree species will be trimmed or removed as enhanced vegetation management is implemented?

Response to Question 15:

All trees identified as "at risk" or "reliability" within the "strike zone" in 2019 will be planned for trimming and/or removal.

Factors and approximate fraction of "at risk" or "reliability" tree species are calculated through a risk matrix in a Tree Risk Assessment Tool, which takes into consideration:

- Overall Tree Condition
- Tree Defects
- Site Conditions
- Tree Lean
- Tree Height Factor
- Likelihood of Line Impact



New Utility Vegetation Management Tree Risk Assessment Tool

Hazard Tree characteristics that consider tree attributes and site attributes help indicate possible hazardous conditions posed on our equipment. These characteristics, of tree and site, are used to risk rank a Subject Tree. Both tree and site attributes may impact the stability of a tree and should be considered when performing a tree risk assessment. Information collected during a tree risk assessment will be captured on the Tree Risk Assessment Form and be submitted to Vegetation Management Compliance & Support (VMC&S) team. The assessment results will be captured in the Work Management System in order to track and manage the prescribed work or other mitigation.





How the Tree Risk Assessment Data will be accessed / exchanged:

Field personnel will use a Fulcrum app on an iOS device. A daily extract file will be provided to VMC&S department from Fulcrum. VMC&S will update the Work Management System with the hazard data identified (tree characteristics and location information) in Fulcrum. Fulcrum will be used as an assessment tool and transaction system. The

transactional data will be updated into the VM Work Management System as the system of record.

How to Use the Fulcrum App:

To aide in the determination of the likelihood of tree failure, the Fulcrum based Tree Risk Assessment App was developed to help users identify the risk based on critical information. Depending on how you answer the questions, the tool will calculate a risk rank score, and suggested priority. (* red star is a mandatory field)

Inspection Information			
1. Hit the + button to start record	 Blank record with prefabbed address and last grid inspected 	3. Enter customer data if applicable	4. Enter address
	Cancel HTMP Risk Assessment Save Cancel HTMP Risk Assessment Save Cancel Save Save Name Save Save Name Save Save Cancel Can Save Save Save Save Save Cancel Can Save Save Save Save Save Cancel Can Save Save Save Save Save Cancel Can Name Save Save Name Save Save Name Save Cancel Can Name Save Save Name Save	2 Statu Laskies IS uni ♥ Falls MI Custorier Data Custorier Data Custorier Notes Custorier Notes Secondary Custall Custorier Notes Custorier Notes Notas Notas Yes Notas Marky Text Yes Notas Ves Notas United Notas Yes Notas Custorier Notas Yes Notas Custorier Custally Notas Yes Notas Custorier Custally Notas	Variable in class of the HTMP Risk Assessment Save Concol HTMP Risk Assessment Save Concol HTMP Risk Assessment Save Concol HTMP Risk Assessment Concol HTMP Risk Asses

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Vegetation Management – Hazard Tree Management Plan
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HTMP Job Aid





Vegetation Management – Hazard Tree Management Plan





Vegetation Management – Hazard Tree Management Plan



HTMP Job Aid



Vegetation Management – Hazard Tree Management Plan

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HTMP Job Aid

Risk Matrix (cont.)	Work	Plan
23. Likelihood of Line Impact (scored in the overall risk score)	24. Work Plan Window (Auto Generated: control number, risk rank score, and suggested priority)	25. EXAMPLE : Changing a couple of the dropdown selections changes the score
Tot How Arouse Concol Appion On Row Image: Construction of Concol and Conco	d& EM San Dis 16	BY PM Suble 16 Image: Cancel HTMP Risk Assessment Save Species A: C- Cottorwood A: A A: C- Cottorwood A: A A: A O ROW On ROW On ROW On ROW DBH Class 24-33.9 A: A A: A: A A: A A Adure No On ROW Overall Tree Condition Externer defaults C Externer defaults C Save A Modure Overall Tree Condition C Site Conditions C Save A Modure WindS C Save A Modurate Laws (5-15 degrees) C C Modurate Laws (5-15 degrees) C C Modurate State Avage: Conductor 15-2 times Lakehood of Line Impact C Work Plan X C Comments C Wind Issue, actively cracking Wind Issue, actively cracking E E
26. EXAMPLE : Same control number, different risk rank score, and different suggested priority (Auto Generated)	Work Plan 27. Select a work priority based on the suggested work priority and assessment (specify reason for change – if applicable)	28. Assign an appropriate treatment to mitigate or remove the risk
Bit M. Isole 1 Image: Add the second sec	Status Sandacita will * 4 60% # Control Number D310201545050506590 Work Plan Suggested Work Prioritization Priority 24- work within 1 month * Sectored Work Prioritization Priority 24- work within 24 hours * Priority 24- work within 24 hours * Priority 24- work within 3 months * Priority 24- work within 6 months * Priority 34- evaluate in 6 months * <	ASS PM Surber II

Vegetation Management – Hazard Tree Management Plan



HTMP Job Aid



DATA REQUEST SET MGRA-SCE-001

To: MGRA Prepared by: Peter Lee Job Title: Senior Business Analyst Received Date: 3/3/2019

Response Date: 3/7/2019

Question 16: What fraction of outages from "at risk" or "reliability" tree fall-ins occur during 1) winter storms or rain storms? 2) high-wind events during dry periods, including fire-weather events 3) dry periods with no wind? This can be an approximate estimation using calendar periods to estimate "wet" and "dry" seasons. High wind designations should be based on weather data.

Response to Question 16:

SCE objects to the question as it is overly broad, unduly burdensome, and because it is beyond the scope of this proceeding. SCE's 2019 Wildfire Mitigation Plan (WMP) is comprised of wildfire mitigation programs and activities SCE plans to undertake in 2019 to reduce wildfire risk. Notwithstanding this objection, SCE responds as follows:

SCE tracks storm outages but currently does not track "at-risk" or "reliability" tree status during winter/rain storms, high-wind events during dry/fire-weather events or dry periods. Intuitively, fall-ins tend to correlate with saturated soil and or high-wind conditions.

The tables below provide the number of Tree Caused Circuit Interruptions (TCCI) during weather events from 2016 to 2018:

2016		
TCCI	Interruption	
Category	Count	
Vegetation		
Blown	496	
Total	496	

2017		
TCCI Category	Interruption Count	
Vegetation		
Blown	477	
Total	477	

20	2018	
TCCI Category	Interruption Count	
Vegetation	Count	
Blown	328	
Total	328	

DATA REQUEST SET MGRA-SCE-001

To: MGRA Prepared by: Peter Lee Job Title: Senior Business Analyst Received Date: 3/3/2019

Response Date: 3/7/2019

Question 17: How many instances of outages due to vegetation contact or fall-in occurred over the last five years for circuits using covered conductor or "tree wire"? How many ignitions? What is the rate per deployed mile of vegetation-caused outages and vegetation-caused ignitions for covered conductor? How does this compare to bare conductor?

Response to Question 17:

SCE objects to the question as it is overly broad, unduly burdensome, and because it is beyond the scope of this proceeding. SCE's 2019 Wildfire Mitigation Plan (WMP) is comprised of mitigation and activities SCE plans to undertake in 2019 to reduce wildfire risk and not historical data from the last five years. Notwithstanding these objections, SCE responds as follows.

Over the last 5 years, SCE infrastructure has had a de minimis level of covered conductor deployed. SCE deployment of covered conductor only started in earnest in 2018. Additionally, SCE does not track outages or ignitions based on type of conductor.

Regarding vegetation-associated ignitions, SCE records fire data in accordance with CPUC Decision 14-02-015, which established the Fire Incident Data Collection Plan for utilities. Pursuant to this decision, SCE Fire Incident Data records currently does not track ignitions based on the type of conductor.

DATA REQUEST SET MGRA-SCE-002

To: MGRA Prepared by: Jonathan Khalaf Job Title: Senior Advisor Received Date: 3/4/2019

Response Date: 3/6/2019

Question 18: What is the internal enforcement mechanism that the utility will use to ensure that all goals set in the Wildfire Mitigation Plans are met?

Response to Question 18:

SCE will track, update, and report on progress towards 2019 goals of individual activities and metrics on the wildfire mitigation metrics/activities included in its 2019 WMP on a monthly basis to SCE senior leadership.

Progress towards 2019 goals of individual activities and higher level metrics will be monitored by the Grid Resiliency and Public Safety Program Management Office and management to enable SCE to address any potential performance challenges. All stakeholders are empowered to suggest improvement opportunities, including: field crews conducting work in HFRA, management reviewing results or trends, or formal internal or external auditors. The owner of each mitigation program or activity will be responsible for developing and implementing corrective actions for improvement opportunities encountered during implementation or for metrics that are off track or trending unfavorably.

As discussed in Section 6.5.2 of SCE's 2019 WMP, ensuring implementation of corrective actions and overall monitoring of the metrics will be the responsibility of the applicable organization. A list of responsible organizations by wildfire mitigation activities can be found in Section 6.1.2. These organizations will report to executive leadership through existing channels.

Additionally, in accordance with P.U.C. Section 8386, SCE will file a report with the CPUC addressing SCE's compliance with its 2019 WMP by March 31, 2020 or another date as determined by the Commission.

DATA REQUEST SET MGRA-SCE-002

To: MGRA Prepared by: Russell Archer Job Title: Senior Attorney Received Date: 3/4/2019

Response Date: 3/6/2019

Question 19: Provide three realistic scenarios in which a utility might start a wildfire and then be held to be imprudent for purposes of cost recovery and in which that imprudence would be tied back to lack of compliance with the Wildfire Mitigation Plan. These scenarios would assume the absence of any other Prudent Manager Standard.

Response to Question 19:

SCE objects to the question to the extent that it calls for information protected by the attorney-client privilege and/or work product doctrines. SCE further objects to the question as it is an incomplete hypothetical, because it calls for speculation and for ultimate legal conclusions, and because it would require the production of a study and not underlying facts. SCE has clearly set forth its position that substantial compliance with its Wildfire Mitigation Plan (WMP) should equate to a finding that SCE has met the prudent manager standard for purposes of the recovery of wildfire-related costs and expenses. That ultimate legal conclusion will be determined by the Commission, the courts, and potentially the State Legislature.