

August 17, 2020

Caroline Thomas Jacobs, Director  
Wildfire Safety Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**SUBJECT:** Southern California Edison's Reply to Comments on Remedial Compliance Plans

Dear Ms. Thomas Jacobs,

Pursuant to the Guidance on the Remedial Compliance Plan & Quarterly Report Process Set Forth in Resolution WSD-002 (Guidance Statement) issued by the Wildfire Safety Division (WSD) on July 17, 2020, Southern California Edison (SCE) hereby submits its reply in response to the public comments served on August 10, 2020 on SCE's 2020 Wildfire Mitigation Plan (WMP) Remedial Compliance Plans (RCPs).

### **INTRODUCTION**

The following stakeholders submitted comments on the Investor-Owned Utilities (IOUs) RCPs: Public Advocates Office (Cal Advocates), Mussey Grade Road Alliance (MGRA), and The Protect Our Communities Foundation (PCF). Only MGRA included recommendations on our submission. Below, SCE responds to MGRA's recommendations on our RCPs.

### **SCE'S RISK MODELING FOR SYSTEM HARDENING DEPLOYMENT ALREADY ACCOUNTS FOR EXTREME FIRE WEATHER**

In its comments to SCE's risk modeling RCP (Guidance-3), MGRA recommends SCE incorporate probability and consequences of ignitions during extreme weather conditions into our risk scores and use these scores to set priorities.<sup>1</sup> MGRA quotes the following sentence in support of its recommendation:

“Since PSPS is significantly influenced by expected and observed weather conditions at a particular time, circuit segments at high risk of PSPS do not necessarily coincide with circuit segments that have high risk score based on probability and consequence of ignition estimated based on average conditions

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<sup>1</sup> MGRA's Comments on 2020 RCPs of SDG&E, PG&E, and SCE at p. 6.

at that location. Therefore, current initiatives for reducing ignition risks do not necessarily target areas that experienced PSPS.”<sup>2</sup>

As explained in our risk modeling RCP, we currently use the Wildfire Risk Model (WRM) to determine probability and consequence of ignition at the asset level for specific locations and to inform prioritization of mitigation deployment such as covered conductor.<sup>3</sup> The WRM includes extreme weather events as part of the consequence score. A 20-year (1999-2018) fire-weather climatology was developed using the Weather Research and Forecasting (WRF) model to recreate historical days of fire-weather significance across SCE’s service territory. This approach included 900 days of the fire-weather conditions during this 20-year period. The REAX Engineering’s consequence score methodology that SCE uses in its WRM further applies the 40 *most severe* fire-weather days out of these 900 days over the 20-year data set period, thus taking into account extreme weather conditions.<sup>4</sup> As also explained in our risk modeling RCP, the probability of ignition portion of the WRM model combines asset attributes into a machine learning algorithm to predict Equipment/Facility Failures and Contact from Object events that may result in ignition. This part of the model is based on historical data, and it is this portion that SCE was referring to when we mentioned “average conditions.”

SCE acknowledges that certain language used in our risk modeling RCP likely contributed to this misunderstanding and appreciates the opportunity to clarify that extreme weather conditions are factored into our risk modeling to inform the prioritization of deployment of mitigation initiatives. Given this clarification, MGRA’s recommendation has already been incorporated and should be dismissed.

### **WIRE-TO-WIRE CONTACT SHOULD REMAIN A SEPARATE FAULT-TYPE CATEGORY**

In response to SCE’s Near Misses RCP (SCE-2), MGRA asserts that properly designed and built equipment should not be subject to wire slap and recommends SCE reclassify wire-to-wire contact as a subcategory of equipment failure. It is SCE’s position that MGRA’s recommendation is not related to this deficiency and should not be considered at this time.

The WSD’s 2020 WMP Guidelines required all utilities to report wire-to-wire contact in Tables 11a, 11b, 18a, and 18b as a separate category. SCE designs its system to withstand many factors that contribute to wire-to-wire contact including, for example, phase spacing, pole geometry, and conductor tension on each phase of the circuit. Wire-to-wire contact does not occur only during high-wind conditions and can result from factors outside a utility’s control such as third parties contacting poles or conductors. A fault is classified as equipment failure when it is due to an inherent

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<sup>2</sup> See SCE’s Guidance-3 Lack of Risk Modeling To Inform Decision-Making, 2020 WMP RCP, p. 29.

<sup>3</sup> See SCE’s Guidance-3 Lack of Risk Modeling To Inform Decision-Making, 2020 WMP RCP, pp. 2-5.

<sup>4</sup> Please note that actual conditions at any given location that drive PSPS decisions can vary from modeled conditions even though the model considers extreme weather conditions.

malfunction or degradation of a structure or electrical facility and the remediation can be replacement of the equipment, not necessarily a design change. Wire-to-wire faults on the other hand is a distinct category of faults which can be reduced by installation of covered conductor or other design changes. It is important to continue to track wire-to-wire contact separately from equipment/facility failure. Additional granularity in fault categories has no downside, and in fact provides the advantage of targeting mitigations.

**MGRA’S RECOMMENDATIONS ON THE VEGETATION MANAGEMENT CLEARANCE DEFICIENCY DEVIATE FROM THE DEFICIENCY CONDITIONS AND ARE DUPLICATIVE OF EXISTING SCE REQUIREMENTS**

In its comments, MGRA ostensibly supports<sup>5</sup> aspects of the IOUs RCPs on the effectiveness of increased vegetation clearances deficiency (SCE-12, SDG&E-13 and PG&E-26), but then provides a few recommendations that appear to deviate from this deficiency’s requirements. MGRA recommends 1) IOUs separately collect and coordinate “fall-in”/“blow-in” data that relates to trees *outside* of the typical clearance distances and 2) for SCE to use the “fall-in”/“blow-in” data to validate our tree-risk calculator.<sup>6</sup> MGRA’s recommendations seem to focus on vegetation management programs other than increased vegetation clearances. Given this confusion, SCE responds to both recommendations.

MGRA’s point that “fall-in” and “blow-in” data is important to collect because these are fire hazards is correct; however, this data, where determined to be outside of the vegetation management clearance program, should not be included in assessing the effectiveness of expanded vegetation clearances. SCE explained in its SCE-12 RCP that tree-caused circuit interruption (TCCI) events, which occur when trees or portions of trees have contacted electrical equipment and caused circuit interruptions, will be the primary metric used in the analysis to meet the conditions. SCE also informed that TCCIs can result from vegetation that has either fallen-in, blown-in, or grown-in. For clarity, SCE did not state that all “fall-in” data would be excluded and instead explained that it *may* exclude outage and ignition events caused by “fall-ins” or “blow-ins” that are deemed *outside* the recommended clearance distances. For example, an outage or ignition that occurs due to a tree “fall in” that is 40-feet away from SCE’s distribution lines is important data to track; however, it is not relevant when assessing expanded vegetation clearances. As such and to the extent that a “fall-in” or “blow-in” caused outage or ignition can be determined to be from a hazard tree or vegetation beyond the recommended enhanced clearance distance then that data will be excluded (as it should) because our RCP specifically focuses on understanding the effectiveness of expanded clearances not SCE’s Hazard Tree Mitigation Program (HTMP) or “blow-ins” that could occur from trees beyond SCE’s rights-of-way.

MGRA also requests that the “fall-in”/ “blow-in” data should be used to validate SCE’s tree risk calculator. MGRA appears to confuse trimming trees to clearances recommended in General Order (GO) 95 and SCE’s HTMP. As explained in our 2020

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<sup>5</sup> MGRA’s Comments on 2020 RCPs of SDG&E, PG&E, and SCE at pp. 6-7.

<sup>6</sup> MGRA’s Comments on 2020 RCPs of SDG&E, PG&E, and SCE at p. 7 (emphasis added).

WMP, SCE's tree-risk calculator determines a risk score for each tree assessed under our HTMP and does not use this model for trimming trees in HFRA per recommended clearances in GO 95.<sup>7</sup> Furthermore, in Decision 20-04-013, the Commission adopted an all-party Settlement that requires SCE, with consultation from the settling parties, to conduct an independent study (Tree Removal Study) to evaluate the need and effectiveness of our tree-risk calculator in implementing the HTMP.<sup>8</sup> MGRA's recommendation on SCE's tree risk calculator is misaligned and duplicative of existing Commission requirements.

## **CONCLUSION**

SCE appreciates the opportunity to submit its reply to stakeholder comments and recommends the WSD reject MGRA's recommendations and approve SCE's RCPs taking into consideration its comments herein.

If you have any questions, or require additional information, please contact me at [carla.peterman@sce.com](mailto:carla.peterman@sce.com).

Sincerely,

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<sup>7</sup> See Section 5.3.5.16.1 of SCE's 2020-2022 WMP.

<sup>8</sup> See Decision 20-04-013, Ordering Paragraph 30.