
January 20, 2021

**ADVICE 4397-E
(U 338-E)**

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION**

SUBJECT: Adoption of Final Modification of the Boundaries of the California Public Utilities Commission High Fire Threat District Within and Near Southern California Edison Company's Service Territory

Southern California Edison Company (SCE) hereby submits this Tier 1 Advice Letter (AL) that includes links to the final Geographic Information System (GIS) Shapefiles that modify the boundaries of the California Public Utilities Commission (CPUC or Commission) High Fire Threat District (HFTD) within and near SCE's service territory.

PURPOSE

The purpose of this Tier 1 AL is to comply with Decision (D.) 20-12-030, Ordering Paragraph (OP) 2, which requires SCE to submit an advice letter, effective upon Commission staff approval, seeking approval of the final modifications to the CPUC HFTD Map within and near SCE's service territory. Commission staff shall then update the relevant links on the Commission's HFTD webpage no later than 30 days after staff approves this Tier 1 AL.

BACKGROUND

In D.17-01-009, as modified by D.17-06-024, the Commission adopted a work plan for developing a map that designates areas of the state of California "where there is an elevated hazard for utility-associated wildfires to occur and spread rapidly, and where communities face an elevated risk from utility-associated wildfires,"¹ commonly referred to as the CPUC Fire-Threat Map (previously referred to as Fire Map 2).² The CPUC HFTD Map is comprised of two map sources and includes three fire-threat areas:

- **Zone 1** consists of Tier 1 High-Hazard Zones (HHZs) from the United States

¹ D.17-01-009, p. 2.

² Further information about and Internet access to the CPUC Fire-Threat Map is available at: <https://www.cpuc.ca.gov/FireThreatMaps/>.

Forest Service (USFS) and California Department of Forestry and Fire Protection (CAL FIRE) joint map of Tree Mortality HHZs. Tier 1 HHZs are in direct proximity to communities, roads, and utility lines, and are a direct threat to public safety.

- **Tier 2** consists of areas on the CPUC Fire-Threat Map where there is an elevated risk (including likelihood and potential impacts on people and property) from wildfires associated with overhead utility power lines or overhead utility power-line facilities also supporting communication facilities.
- **Tier 3** consists of areas on the CPUC Fire-Threat Map where there is an extreme risk (including likelihood and potential impacts on people and property) from wildfires associated with overhead utility power lines or overhead utility power-line facilities also supporting communication facilities. Tier 3 is distinguished from Tier 2 by having the highest likelihood of utility-associated fire initiation and growth that would impact people or property, and where the most restrictive utility regulations are necessary to reduce utility fire risk.

Together, Zone 1, Tier 2 and Tier 3 constitute the HFTD. Pursuant to the adopted work plan, Pacific Gas and Electric Company (PG&E) and San Diego Gas & Electric Company (SDG&E) submitted a joint advice letter for approval of the CPUC Fire-Threat Map. On January 19, 2018, the Commission adopted the CPUC Fire-Threat Map via staff approval of that joint advice letter.³

D.17-12-024 also adopted regulations to enhance fire safety in the HFTD. These fire-safety regulations aim to reduce the fire hazards associated with overhead power-line facilities and aerial communication facilities located in close proximity to overhead power lines, and are contained in the Commission's General Orders (GOs) 95, 165 and 166, and Rule 11 of each of the electric investor-owned utilities' electric tariff rules.

On August 19, 2019, SCE filed a petition for modification of D.17-12-024 (PFM). The PFM sought to add specific areas within and near SCE's service territory that were not then currently included in the HFTD, into Tier 2. Of the 43 original proposed area additions, 40 are within SCE's service territory; the other three areas are located within SCE's boundaries and house SCE equipment, but are not within SCE's service territory.⁴ SCE conducted a review of areas it historically identified as high fire risk areas (HFRA), which included a combination of SCE's historical map boundaries, CAL FIRE's Fire Hazard Severity Zone maps, and the CPUC Fire-Threat Map. Some parts of SCE's designated HFRA were then not currently part of the HFTD, and therefore the Commission's fire-safety regulations did not apply to the entirety of SCE's designated HFRA. SCE, though, has generally treated all of its designated HFRA consistently with respect to wildfire threat mitigation strategies, standards, programs and activities (with appropriate distinction when relevant between Tier 2 and Tier 3 areas). Much of SCE's HFRA and the PFM's proposed areas to be included in the HFTD reflected the results of

³ Advice Letter 5211-E and 3172-E.

⁴ PFM at p. 6 and fn. 11.

a Monte Carlo-based modeling. The modeling simulated hundreds of thousands of ignitions at randomly selected points within 100 meters of overhead electric facilities, and was performed by a third-party engineering firm with experience in fire engineering and risk modeling.⁵

On July 27, 2020, the assigned Administrative Law Judge (ALJ) issued an email ruling directing SCE to submit supplemental information to facilitate the Commission's review of SCE's proposed changes to the HFTD, and providing notice that CAL FIRE would serve in the role that the Independent Review Team (IRT) served during the original development of the CPUC Fire-Threat Map. SCE filed the supplemental information as directed.

For SCE's original proposed changes, CAL FIRE (serving in the role of the IRT) provided the results of its technical review to SCE. CAL FIRE based its technical review on the same criteria used by the IRT for reviewing proposed changes in the development of the CPUC Fire-Threat Map. These criteria were factors that impact the likelihood of fire ignition and spread, including fuel type, density and arrangement, climate influences on moisture content distributions; climatology of fire weather (fire wind speeds and directions, temperature, precipitation); and terrain (slope, ruggedness, access, and fire break) along with geographical context to other key land and fuel features.⁶

Based on its initial review, CAL FIRE rejected SCE's proposed inclusion in Tier 2 of the HFTD of polygons 110, 149, 281, 314, 448, 841, 974, 987, and 1052. In general, CAL FIRE found that these polygons did not represent areas with an elevated risk of wildfire ignition or spread, due to the absence of continuous fuels. CAL FIRE also rejected polygon 5 for inclusion in Tier 2 because this area is adjacent to and more closely reflects the ignition and spread characteristics of Tier 3 areas. CAL FIRE's review also identified imprecise boundary alignment of many of SCE's original proposed polygons with the boundaries of the then-current HFTD. SCE was provided an opportunity to modify and/or provide further rationale for a rejected polygon's inclusion in the HFTD.

SCE submitted a revised geodatabase to correct the imprecise boundary alignment issues identified by CAL FIRE and provided further justification for its request to include polygons 314, 448, and 1052 in Tier 2; and to specify its request regarding polygon 5 to be included in Tier 3 of the HFTD. SCE's resubmission clarified that polygons 314, 448 and 1052 contain some fuels that, though not entirely continuous, still potentially allow for fire to propagate and impact nearby structures or higher-risk areas. CAL FIRE conducted a technical review of and approved SCE's revised geodatabase. Therefore, SCE's proposed changes to the HFTD, as reflected in Appendix C of the of the PFM, was approved with the following modifications:

⁵ Appendix C of the PFM includes a report of those modeling results, with detailed information for each area, or polygon, that SCE originally proposed to include in the HFTD.

⁶ D.17-01-009, Attachment 2, Figure 1: Tier Quadrant

- Polygons 110, 149, 281, 841, 974, and 987 shall not be included in the HFTD.
- Polygon 5 shall be included in Tier 3 of the HFTD.
- The remaining polygons that SCE proposed to include in Tier 2 of the High-Fire Threat District, as modified by SCE's revised geodatabase, shall be included in Tier 2 of the HFTD.⁷

No changes were proposed to Zone 1 or Tier 2 and Tier 3 areas outside of SCE's service territory and where SCE equipment is located near SCE's service territory. Given that the HFTD boundaries outside the modifications approved by D.20-12-030 are not the work product of SCE, a copy of and link to those portions of the HFTD are not provided as part of this filing.

No cost information is required for this AL.

This AL will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

MAP AVAILABILITY

In accordance with the requirements of D.20-12-030, the final modified boundaries of the CPUC HFTD Map within and near SCE's service territory to which the fire-safety regulations adopted in D.17-12-024 will apply beginning no later than June 30, 2021 is available for download from the following link:

https://library.sce.com/?10000_group.propertyvalues.property=jcr%3Acontent%2Fmeta%2Fcq%3Atags&10000_group.propertyvalues.operation>equals&10000_group.propertyvalues.0_values=sce-document-library%3Asce-high-fire-area-emergency-documents%2F-resources%2F-high-fire-risk-area-boundaries

The above link contains 1) a high-resolution .pdf of the final modified boundaries of the CPUC HFTD within and near SCE's service territory and 2) a .zip archive that includes the GIS Shapefiles that are readable in commonly available GIS software such as QGIS and Arc Map.

A copy of the final modified boundaries of the CPUC HFTD within and near SCE's service territory is also attached as Attachment 1.

TIER DESIGNATION

Pursuant to GO 96-B, Energy Industry Rule 5.1 and D.20-12-030, OP 2, this AL is submitted with a Tier 1 designation.

⁷ The approved areas for inclusion in the HFTD constitute 36,673 acres, or approximately 82 percent of the 44,527 acres originally proposed by the PFM for inclusion in the HFTD.

EFFECTIVE DATE

SCE respectfully requests that this AL become effective January 20, 2021, which is the same date as its submission.

NOTICE

Anyone wishing to protest this AL may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice letter. Protests should be submitted to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this AL should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone (626) 302-9645
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Tara S. Kaushik
Managing Director, Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this AL to the interested parties shown on the attached GO 96-B, R.15-05-006, R.18-10-007,

R.18-12-005, and A.18-09-002 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with PUC Section 491, notice to the public is hereby given by submitting and keeping this AL at SCE's corporate headquarters. To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Ryan Stevenson at (626) 302-3613 or by electronic mail at ryan.stevenson@sce.com.

Southern California Edison Company

/s/ Gary A. Stern, Ph.D.
Gary A. Stern, Ph.D.

GAS:rs:jm
Enclosure



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

☐ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person:

Phone #:

E-mail:

E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☐ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? ☐ Yes ☐ No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? ☐ Yes ☐ No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

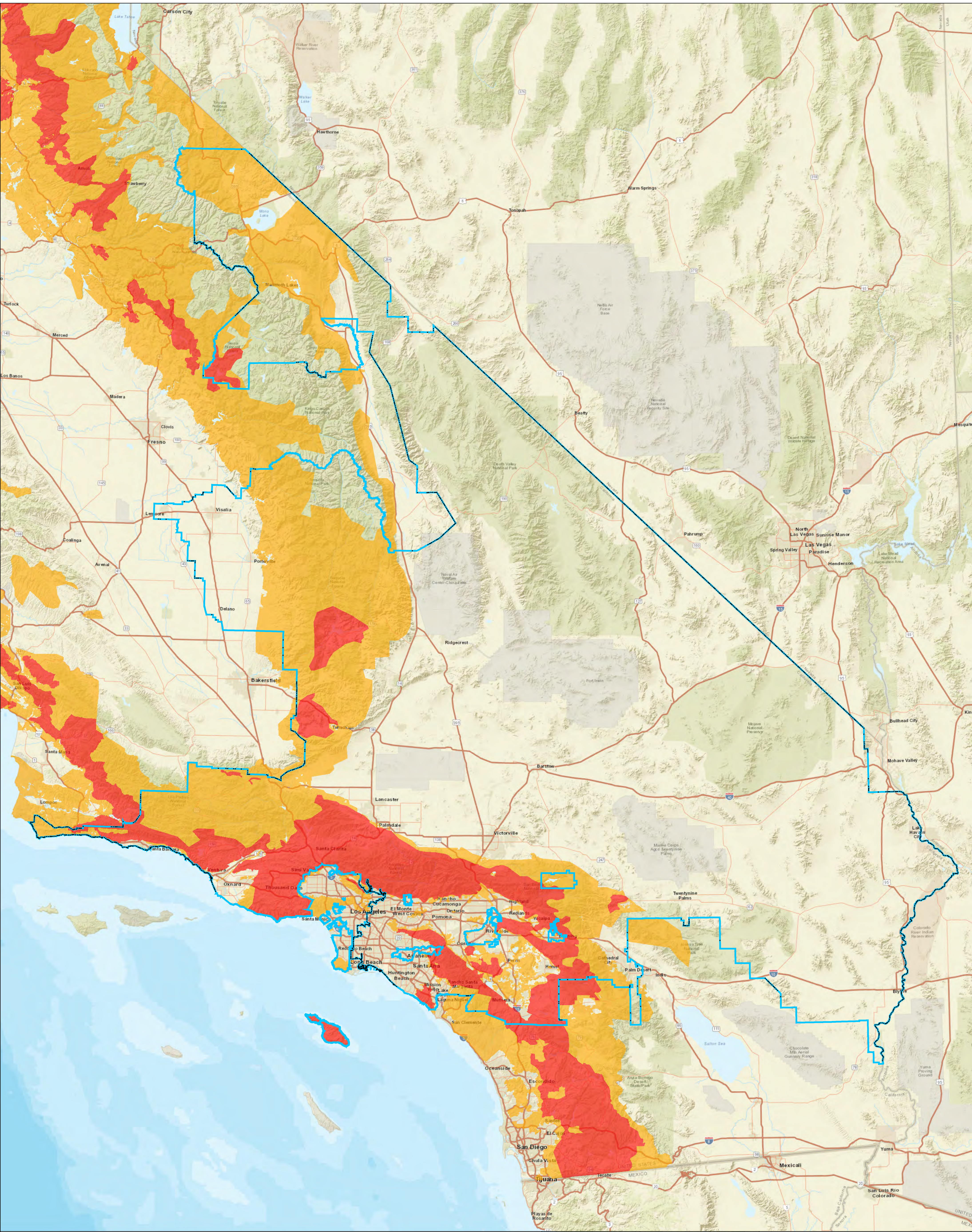
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Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:




ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtailable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

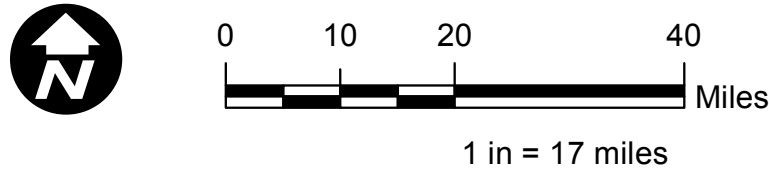
Attachment 1



SCE High Fire Risk Area (HFRA)

-  SCE Territory
-  CPUC Tier 2 - Elevated
-  CPUC Tier 3 - Extreme

APPROVED FOR EXTERNAL USE - FOR REFERENCE ONLY



Date: 12/11/2020
File Name: HFRA_OverviewMap_External.mxd
Version #: 05
Created By: KChaffey
Geospatial Analysis

This map and features/boundaries are intended for general reference purposes only. Distances and locations may be distorted at this scale. Please consult with your SCE representative if you have any questions pertaining to this map or features contained herein.

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