



**Carla Peterman**  
Senior Vice President  
Strategy & Regulatory Affairs

September 16, 2020

Caroline Thomas Jacobs, Director, Wildfire Safety Division  
Ed Randolph, Deputy Executive Director, Energy and Climate Policy  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**SUBJECT:** WMP Change Order Update: SCE to Enter into Agreement with Orange County Fire Authority to Lease a Helitanker Aircraft for Additional Fire Suppression Capability

Dear Ms. Thomas Jacobs and Mr. Randolph:

Given the intensity of the 2020 fire season and potential strain on fire-fighting resources, SCE is expanding its collaboration with fire agencies, and is partnering with Orange County Fire Authority (OCFA) to lease a Helitanker aircraft for the fourth quarter of 2020 to enhance fire suppression capability in SCE's service area. Since this is a modification of SCE's wildfire mitigation initiatives approved in WSD Resolution 002, I am bringing this change to your attention as a courtesy and to encourage approval of the WMP Change Order Report (filed September 11) detailing this change. As discussed below, SCE deems this effort to be prudent and practical in the near-term to further reduce the impact of fires on our communities, customers and facilities.

2020 has been one of the most active and intense fire seasons, even when compared to recent history. Based on dry fuel conditions and weather forecasts across SCE's service area, we continue to prepare for a long and severe fire season. Although fire agencies in SCE's service area have committed significant ground resources, they are expected to be strained. COVID-19 is putting additional pressures on the availability and dispatch of these ground resources. The speed and force of initial aerial attacks are essential to limit the spread of fires, provide additional time for ground fire suppression resources to mobilize, protect life and property (including SCE's physical assets) and to preserve delivery of critical and essential services such as electricity, especially with the COVID-19 safer-at-home restrictions.

OCFA recently retired two of its Super Huey helicopters due to safety concerns, further straining its fire suppression capability by more than 50%. While OCFA is still operating its two-remaining medium-lift helicopters, there is a recognition that this would be noticeably inadequate for the expected need this year. To address this issue, OCFA, in consultation with Los Angeles and Ventura County fire agencies, proposed leasing the

Coulson-Unical CH-47 helitanker from Coulson Aviation. This helitanker, with a combination of fast response speed and higher load capacity, will be crucial to better respond to fires, especially when access to aerial and ground resources are constrained.

The Coulson-Unical CH-47 helitanker will supplement the aircrafts available to OCFA currently. This helitanker will be available for all wildfires across SCE's service area during the fourth quarter of 2020. Based on historical data and experience of fire activities, its use will most likely be within Los Angeles County, Ventura County and Orange County. OCFA, together with the other fire agencies, and in close cooperation with CAL FIRE when appropriate, will coordinate and prioritize the use of the aircraft based on their extensive expertise of fire suppression activities. OCFA is currently evaluating central, strategic airport locations for the aircraft's base to enable the aircraft to respond rapidly across SCE's service area. In operating the helitanker, OCFA will prioritize fire suppression activities in and throughout SCE's service area, unless in their professional judgment of OCFA fire suppression beyond SCE's service area will maximize safety benefits or if OCFA is directed otherwise by the appropriate governmental authorities.

SCE will fund the helitanker's fixed lease costs during the fourth quarter of 2020. Once SCE's Change Order Report is approved, the costs will be tracked in SCE's Wildfire Mitigation Plan Memorandum Account for a subsequent reasonableness review. OCFA will cover the costs associated with operating the helitanker while in-flight or coordinate those operating costs with other fire jurisdictions. Additional details of the final agreement terms and level of financial and operational support from the other agencies are being developed based on the specific needs during the 2020 fire season.

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

Sincerely,

//s//

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Southern California Edison Company