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September 11, 2020

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**SUBJECT:** Southern California Edison Company's First Change Orders Report

Director Thomas Jacobs,

In compliance with Resolution WSD-002, Ordering Paragraph 10, Southern California Edison Company (SCE) hereby submits its first Change Orders Report describing changes to wildfire initiatives set forth in its 2020-2022 Wildfire Mitigation Plan (WMP) and other changes under consideration as new information becomes available and as SCE gains experience and measures the outcomes of its initiatives.

### **BACKGROUND**

On June 11, 2020, the California Public Utilities Commission (CPUC or Commission) ratified the Wildfire Safety Division's (WSD) Action Statements and associated Resolutions conditionally approving electric utilities' 2020-2022 WMPs. On June 19, 2020, the Commission issued the final utility Resolutions: Guidance Resolution WSD-002 and SCE-specific Resolution WSD-004.

Resolution WSD-002 directed the electrical corporations to submit two Change Orders Reports describing the changes to 2020-2022 WMP programs and initiatives being considered by the electrical corporation. As stated, "the objective of the change order process is to ensure the electrical corporation continues to follow the most effective and efficient approach to mitigate its wildfire risk. This could change as new information becomes available and as the electrical corporation gains experience and measures the outcomes of its initiatives (p. 32)." SCE has limited this Change Orders Report to program or initiative changes 1) that have a significant increase or decrease in scale from an activity's 2020 program target, 2) where an initiative was suspended or ended, and 3) for programs and strategies that have evolved or are anticipated to continue to evolve based on new information and analysis.

This Change Orders Report does not include changes to initiatives that are still being evaluated and/or anticipated in year 2021 and beyond. As SCE explained in its 2020-2022 WMP, efforts to improve its wildfire risk reduction programs and strategies will continue to evolve based on new information and analysis.

## **FIRST CHANGE ORDERS REPORT**

SCE's First Change Orders Report is organized by category as described in its 2020-2022 WMP. The major program subheadings start with either the section in the 2020-2022 WMP that describes the affected program or the specific initiative that has been modified, reduced, increased, suspended, or ended. These are followed by the section or activity descriptions included in the 2020-2022 WMP. A reference name is included in the subheading that outlines the enhancement, change, or modification. Each proposed change includes the relevant program/initiative name and/or number, where it is discussed in SCE's 2020-2022 WMP narrative<sup>1</sup> and tables,<sup>2</sup> budgetary details,<sup>3</sup> the type of change being proposed, justification, and expected outcomes.

## **COVID-19 2020-2022 WMP ACTIVITY IMPACTS**

Though the COVID-19 crisis has created many challenges, SCE continues to focus on wildfire mitigation activities, adjusting as necessary. This is especially important for customer and community safety at a time when customers and communities are already dealing with other public safety challenges. At the same time, SCE is sensitive to the impact SCE's work might have on customers sheltering in place and on critical facilities. SCE's August 18, 2020 submission to the WSD regarding COVID-19 Impacts to 2020-2022 WMP Initiatives<sup>4</sup> summarizes the wildfire mitigation initiatives that have been impacted by COVID-19 restrictions, provides the original plans for these impacted initiatives and notes changes in operations as a result of the impact of COVID-19. SCE is not including changes resulting from COVID-19 in this Change Orders Report because they have already been addressed in the aforementioned submission. SCE will continue to monitor and, where possible, accommodate COVID-19-related impacts and will report on any additional developments in its quarterly Assembly Bill (AB) 1054 advice letters, next Change Orders Report, and/or in the 2021 WMP Update, as applicable.

## **PROPOSED CHANGES**

### **A. Asset Management and Inspections Initiative Changes**

#### **I. Proposed Change: IN-1.1 and IN-1.2, Increase in Scale**

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<sup>1</sup> See SCE's 2020-2022 Wildfire Mitigation Plan - Revision 03.

<sup>2</sup> See SCE's 2020 WMP Tables 1-31 Revision 02.

<sup>3</sup> Forecasted spend is provided for 2020, 2021-2022 forecasts will be provided in SCE's 2021 WMP Update submission.

<sup>4</sup> See SCE's submission on Impacts of COVID-19 on 2020-2022 WMP Initiatives.

- a. The initiatives being altered with reference to where in the WMP the initiatives are discussed in the narrative and tables, along with the planned budgets:

**IN-1.1 Proposed Change**

<b>2020-22 WMP Section:</b>	Section 5.3.4.9.1 High Fire Risk Informed Inspections of Distribution Electric Lines and Equipment, pp. 139-140 (IN-1.1)
<b>2020-22 WMP Table:</b>	Table 24, Initiative Activity 9.1. Other discretionary inspection of distribution electric lines and equipment, beyond inspections mandated by rules and regulations: distribution high fire risk-informed inspections (IN-1.1)
<b>2020 Program Target:</b>	Inspect 105,000 structures in HFRA
<b>Proposed Change / Type:</b>	As noted in its 2020-2022 WMP, SCE is continuing to improve its inspection programs to incorporate more risk-informed approaches and lessons learned. This has resulted in SCE conducting additional High Fire Risk-Informed Inspections (HFRI) in 2020. SCE is increasing the scale of both its Distribution and Transmission HFRI in 2020.
<b>2020 Planned Spend:</b>	\$4.6 million (Source: Table 24, Initiative Activity 1 + Initiative Activity 9.1)
<b>Spent in 2020 YTD:</b>	\$8.8 million as of July 2020
<b>Planned Spend – Remainder of 2020:<sup>5</sup></b>	2020 revised forecast is approximately \$9.8 million; Planned spend for remainder of 2020 is approximately \$1 million; Increase is due to the additional inspections described in this report and additional data capture costs
<b>Redeployment of Funds in 2020:</b>	No funds have been identified for redeployment for this activity

<sup>5</sup> Forecasted spend is provided for 2020, 2021-2022 forecasts will be provided in SCE’s 2021 WMP Update submission.

## IN-1.2 Proposed Change

<b>2020 WMP Section:</b>	Section 5.3.4.10.1 High Fire Risk Informed Inspections of Transmission Electric Lines and Equipment Overview, pp. 143-144 (IN-1.2)
<b>2020 WMP Table:</b>	Table 24, Initiative Activity 10.1. Other discretionary inspection of transmission electric lines and equipment, beyond inspections mandated by rules and regulations: transmission risk-informed inspections in HFRA (IN-1.2)
<b>2020 Program Target:</b>	Inspect 22,500 structures in HFRA
<b>Proposed Change / Type:</b>	As noted in its 2020-2022 WMP, SCE is continuing to improve its inspection programs to incorporate more risk-informed approaches and lessons learned. This has resulted in SCE conducting additional HFRI in 2020. SCE is increasing the scale of both its Distribution and Transmission HFRI in 2020.
<b>2020 Planned Spend:</b>	\$2.3 million (Source: Table 24, Initiative Activity 2 + Initiative Activity 10.1)
<b>Spent in 2020 YTD:</b>	\$5.6 million as of July 2020
<b>Planned Spend – Remainder of 2020:<sup>6</sup></b>	2020 revised forecast is approximately \$6 million; Planned spend for remainder of 2020 is approximately \$0.4 million; Increase is due to the additional inspections described in this report and unit cost pressures due to additional travel time and support for inspections in rural areas
<b>Redeployment of Funds in 2020:</b>	No funds have been identified for redeployment for this activity

b. A detailed description of the proposed change:

In 2020, SCE continued to refine its risk-informed approach for both its Distribution and Transmission HFRI. Being mindful of the need to balance risk mitigation and the cost of inspections, rather than inspecting all HFRA structures, SCE used risk models based on the probability of ignition and the consequence of ignition to identify high and medium risk structures for inspection. These risk models, as well as the planned improvements to the models, are described in SCE’s Remedial Compliance Plan (RCP) for the Guidance-3 WMP deficiency.<sup>7</sup> As SCE continues to refine its risk models, it has determined the scale of high and medium structures for inspection should be increased from initial 2020-2022 WMP targets to reduce more wildfire risk, as summarized below:

<sup>6</sup> Id.

<sup>7</sup> See SCE 2020 WMP Remedial Compliance Plan Class A Conditions, submitted on July 27, 2020, available at <https://www.cpuc.ca.gov/wildfiremitigationplans/>.

- IN-1.1 HFRI of Distribution Electric Lines and Equipment: On track to inspect at least 165,000 structures, an increase from the stated WMP target of at least 105,000 structures
- IN-1.2 HFRI of Transmission Electric Lines and Equipment: On track to inspect approximately 33,500 structures, an increase from the stated WMP target of at least 22,500 structures

SCE's risk-informed strategy exceeds the Commission's compliance requirements by performing inspections more frequently than required on higher-risk structures while still meeting the compliance inspection requirements for lower-risk structures. SCE is also collecting data and identifying conditions that surpass a traditional inspection. Therefore, SCE's risk-informed approach goes beyond compliance rather than being limited by it.

## **II. Justification for the proposed change**

Increasing the scale of both Distribution and Transmission HFRI improves the effectiveness of these initiatives. The 2020-2022 WMP original targeted quantity of inspections would have addressed all high risk and approximately half of the medium risk assets. With the proposed change, all high or medium risk structures or poles will be inspected in 2020. These increased inspections, which is aligned with the number of aerial inspections, will further reduce wildfire risk and provide a 360-degree view of an asset for additional analytics into future inspection processes.

## **III. Change in expected outcomes from the proposed change**

- a. What outcomes, including quantitative ignition probability and PSPS risk reduction, was the changed initiative expected to achieve in the 2020 WMP?

SCE's Enhanced Overhead Inspection (EOI) program in 2019 demonstrated that the requirements, scope and frequency of compliance-driven grid patrols and overhead detailed inspections were insufficient in detecting a large number of potential hazards which, if not remediated, would increase the risk of ignition in HFRA. Deterioration of overhead structures and assets increases the probability of failures and faults and the associated risk of ignition associated with electrical infrastructure.

SCE continues to deploy a comprehensive inspection program for overhead facilities in HFRA to detect equipment issues and mitigate ignition risks that otherwise cannot be detected during compliance-driven inspections alone. These inspections will also be more frequent than the compliance requirements of every five years (distribution) or three years (transmission) and will focus on identifying equipment or structure degradation due to natural wear and tear or emergent events since the 2019 inspections. Though it was necessary to inspect all circuits in 2019 to set a baseline,

frequency and scope of inspections in 2020 and beyond has been adjusted based on risk analysis as described in the proposed change above.

- b. What outcomes, including quantitative ignition probability and PSPS risk reduction, will the initiative deliver with the proposed adjustment?

Increasing the scale of both Distribution and Transmission HFRI reduces wildfire risk (ignition probability) based on the number of defects found and remediated. In its response to Class B Deficiency Guidance-1,<sup>8</sup> SCE provides the baseline of the original program targets. This increase in scale of inspection work will further reduce wildfire risk presented in that response and will be reflected in SCE's 2021 WMP Update submission.

## B. Emergency Planning and Preparedness Initiative Changes

### I. Proposed Change: DEP-3, Other Change (End)

- a. The initiative being altered with reference to where in the WMP the initiative is discussed in the narrative and tables, along with the planned budget:

#### DEP-3 Proposed Change

<b>2020 WMP Section:</b>	Section 5.3.9.2 Community Outreach, Public Awareness, and Communications Efforts, pp. 196-198, (DEP-3)
<b>2020 WMP Table:</b>	Table 29, Initiative Activity 2. Community outreach, public awareness, and communications efforts (DEP-1.1 - DEP-1.3, DEP-3)
<b>2020 Program Target:</b>	Participate in statewide multichannel and multi-lingual campaign using digital ads, social media ads, and radio ads to provide customers with important and consistent messaging about wildfire mitigation activities happening across the state
<b>Proposed Change/Type:</b>	SCE initially suspended its statewide campaign in DEP-3, as described in its June 1, 2020 WMP Off Ramp Report, <sup>9</sup> and is now proposing to end this initiative and redeploy the funds to another initiative.
<b>2020 Planned Spend:</b>	\$5.2 million <sup>10</sup> (Source: Sub-activity for IOU Customer Engagement (DEP-3) in Table 29, Initiative Activity 2)

<sup>8</sup> See SCE's response to Class B Deficiency Guidance-1 in SCE's 2020-2022 WMP First Quarterly Report, submitted on September 9, 2020.

<sup>9</sup> See SCE's Advice Letter 4222-E, Possible Off Ramps Pursuant to Guidance Decision on 2019 Wildfire Mitigation Plans, filed on June 1, 2020.

<sup>10</sup> Total forecasted for 2020 in Table 29, Initiative Activity 2 is \$9.1 million, which includes DEP-1.1 through DEP-1.3 and DEP-3; DEP-3's sub-total is \$5.2 million forecasted for 2020.

<b>Spent in 2020 YTD:</b>	\$0 as of July 2020
<b>Planned Spend – Remainder of 2020:<sup>11</sup></b>	Planned spend for remainder of 2020 is \$0
<b>Redeployment of Funds in 2020:</b>	SCE is redeploying the approximately \$4.1 million of the planned \$5.2 million spend from the IOU Customer Engagement statewide campaign (DEP-3) to SCE’s local marketing campaign (DEP-1.3) as part of its continuing proactive outreach to communities prior to and during peak wildfire season to ensure customer education and preparedness.

b. A detailed description of the proposed change:

The IOU Customer Engagement effort is a multi-channel, multi-lingual campaign using digital, social media and radio ads to provide customers with important and consistent messaging about wildfire mitigation activities happening across the state. In 2019, a statewide education campaign ran from May-July and then pivoted to local campaigns through December (DEP-1.3). In its 2020-2022 WMP, SCE described how it planned to align its local outreach campaign with Public Safety Power Shutoff (PSPS) education campaigns airing statewide in conjunction with the other two large electric Investor-Owned Utilities (IOUs) and California Governor's Office of Emergency Services (Cal OES).

After SCE filed its 2020-2022 WMP, it began analyzing customer engagement metrics (e.g., awareness and clicks to websites) for its education and outreach efforts in 2019. Early analysis suggested that SCE’s local campaigns were more effective than statewide campaigns in increasing customer awareness of SCE’s wildfire efforts.

SCE is proposing to redeploy approximately \$4.1 million from the statewide campaign to SCE’s local marketing campaign as part of its continuing proactive outreach to communities prior to and during peak wildfire season to ensure customer education and preparedness.

**II. Justification for the proposed change**

By suspending the IOU Customer Engagement campaign and redeploying the budget to SCE’s local marketing campaign, SCE will be more effective in its outreach to customers and communities for wildfire and PSPS education and preparedness efforts. The IOUs have regularly reported to Cal OES results from their local campaigns. After early analysis suggested that a separate statewide customer engagement campaign may not be as effective as its local campaign in increasing customer awareness of wildfire efforts, SCE communicated with the other IOUs and Cal OES, in a regularly

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<sup>11</sup> Forecasted spend is provided for 2020, 2021-2022 forecasts will be provided in SCE’s 2021 WMP Update submission.

scheduled meeting/call on March 23, 2020, its desire to end this initiative and place more emphasis on local campaigns. In September 2020, Cal OES acknowledged and accepted SCE's PSPS Communications and Engagement Plan, inclusive of ending the statewide campaign. SCE will continue to analyze campaign survey data to improve customer awareness and understanding.

### **III. Change in expected outcomes from the proposed change**

- a. What outcomes, including quantitative ignition probability and PSPS risk reduction, was the changed initiative expected to achieve in the 2020 WMP?

This activity is not intended to directly reduce ignition probability or wildfire consequence; however, it can help customers and communities be better prepared thus reducing the impacts of wildfires and PSPS events. The statewide campaign sought to educate customers about PSPS and emergency preparedness and reduce the impact of a PSPS or wildfire event through customers' preparedness.

- b. What outcomes, including quantitative ignition probability and PSPS risk reduction, will the initiative deliver with the proposed adjustment?

Aligned with the original objective of the statewide campaign, the local marketing campaign (DEP-1.3) seeks to educate customers about PSPS and emergency preparedness and reduce the impact of PSPS or wildfire events through customers' preparedness. SCE evaluates the effectiveness of its local marketing campaign by measuring customer awareness using a monthly Customer Attitude Tracking (CAT) survey, the results of which are aggregated on a quarterly and annual basis. The local marketing campaign has a goal of 40% awareness about the purpose of PSPS and emergency preparedness and SCE expects its local campaign to achieve or surpass that goal.

## **C. Grid Operations and Protocols Initiative Changes**

### **I. Proposed Change: OP-2, Increase in Scale**

- a. The initiative being altered with reference to where in the WMP the initiative is discussed in the narrative and tables, along with the planned budget:



## OP-2 Proposed Change

<b>2020 WMP Section:</b>	Section 5.3.6.5.7 Wildfire Infrastructure Protection Team Additional Staffing, pp. 168-169 (OP-2)
<b>2020 WMP Table:</b>	Table 26, Initiative Activity 5.7. PSPS events and mitigation of PSPS impacts: wildfire infrastructure protection team additional staffing (OP-2)
<b>2020 Program Target:</b>	Hire additional resources including: a senior compliance manager, two compliance advisors, a project/program advisor, a data specialist and a fire-weather meteorologist. PSPS Operations will also be staffed to provide dedicated operational, project management, and compliance capabilities.
<b>Proposed Change/Type:</b>	SCE is proposing an increase in scale for its Wildfire Infrastructure Protection Team to include 18 additional full-time employees who will serve on the dedicated PSPS Incident Management Team (IMT).
<b>2020 Planned Spend:</b>	\$1.8 million (Source: Table 26, Initiative Activity 5.7)
<b>Spent in 2020 YTD:</b>	\$0.3 million as of July 2020
<b>Planned Spend – Remainder of 2020:<sup>12</sup></b>	Of the original \$1.8 million, SCE is now forecasting to spend \$1 million due to delays in hiring; the additional 18 employees represent an incremental \$0.5 million in 2020, bringing the 2020 forecast for OP-2 to \$1.5 million
<b>Redeployment of Funds in 2020:</b>	No funds have been identified for redeployment for this activity

b. A detailed description of the proposed change:

SCE continuously monitors weather forecasts as well as other key fire threat indicators, such as vegetation moisture content, to anticipate the potential need for PSPS events. In the event where SCE anticipates a potential de-energization due to extreme weather and other high-fire threat conditions, SCE utilizes a PSPS IMT, sourced from a large pool of company-wide resources, to manage and coordinate potential responses. IMTs are placed on rotations, and on-call teams are required to respond to the EOC within two hours, with limited exceptions. These teams are specifically structured to have multiple backups available, so that response and recovery efforts can be conducted 24 hours-a-day for several days or even weeks.

In order to improve its PSPS readiness capabilities, reduce employee fatigue, and help improve coordination, consistency and execution of PSPS events, SCE determined that it needs a fully dedicated PSPS IMT, trained in PSPS event management following

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<sup>12</sup> Forecasted spend is provided for 2020, 2021-2022 forecasts will be provided in SCE's 2021 WMP Update submission.

Incident Command System (ICS) standards and procedures.<sup>13</sup> SCE is proposing an increase in scale for its Wildfire Infrastructure Protection Team to include 18 additional full-time employees. Currently, SCE resources performing PSPS activities are spread across various enterprise operating units. Aligned with this activity's 2020-2022 WMP 2020 program target, this proposal would add incremental additional full-time employees to provide dedicated operational, project management, and compliance capabilities for PSPS.

## **II. Justification for the proposed change**

An increase in scale for its Wildfire Infrastructure Protection Team to include 18 additional full-time employees who will serve as the dedicated PSPS IMT will improve PSPS readiness capabilities and resource use efficiency related to PSPS Operations. Based on lessons SCE learned in 2019 and early 2020, having variable resources from PSPS event to event created inefficiencies in operations and decision-making. Additionally, a dedicated full-time PSPS IMT reduces stress on company-wide employees being "activated" for PSPS events and allows employees to focus on their regular roles, including many employees who are working on other wildfire mitigation efforts, uninterrupted by "activations."

## **III. Change in expected outcomes from the proposed change**

- a. What outcomes, including quantitative ignition probability and PSPS risk reduction, was the changed initiative expected to achieve in the 2020 WMP?

While this initiative does not directly reduce probability or consequence of ignitions, dedicated and specialized staff helps to ensure operational consistency and enhance efficiency in implementing PSPS standards/protocols, thus reducing PSPS impacts on customers.

- b. What outcomes, including quantitative ignition probability and PSPS risk reduction, will the initiative deliver with the proposed adjustment?

The increased scale and cost of the PSPS IMT does not directly reduce probability or consequence of ignitions. This initiative adjustment is expected to reduce the number of events requiring activation of broader IMT resources from across the company (normalized by weather events). These dedicated resources should additionally increase the accuracy and precision of each PSPS response.

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<sup>13</sup> SCE's Wildfire Infrastructure Protection Team consists of the PSPS Operations Group within SCE's Transmission, Substations, and Operations Department and Wildfire/PSPS Response group within SCE's Business Resiliency Department.

## D. Stakeholder Cooperation and Community Engagement Initiative Changes

### I. Proposed Change: Cooperation with Suppression Agencies, Change in Work Being Done

- a. The initiative being altered with reference to where in the WMP the initiative is discussed in the narrative and tables, along with the planned budget:

#### Cooperation with Suppression Agencies Proposed Change

<b>2020 WMP Section:</b>	5.3.10.3 Cooperation with Suppression Agencies, pp. 203-204
<b>2020 WMP Table:</b>	Table 30, Initiative Activity 3. Cooperation with suppression agencies
<b>2020 Program Target:</b>	N/A, outside of current SCE-specified WMP activities/programs
<b>Proposed Change/Type:</b>	Given the intensity of the 2020 fire season and potential strain on fire-fighting resources, SCE is enhancing and expanding collaboration with fire agencies to support aerial fire suppression activities.
<b>2020 Planned Spend:</b>	N/A
<b>Spent in 2020 YTD:</b>	N/A
<b>Planned Spend – Remainder of 2020:<sup>14</sup></b>	SCE is currently negotiating an agreement with Orange County Fire Authority (OCFA), where SCE expects to cover the fixed costs associated with leasing a Helitanker aircraft for the fourth quarter of 2020, estimated to be in the range of \$2.1-2.5 million.
<b>Redeployment of Funds in 2020:</b>	No funds have been identified for redeployment for this initiative

- b. A detailed description of the proposed change:

SCE's 2020-2022 WMP described the activities SCE undertakes to strengthen working relationships with fire suppression agencies to be trusted partners in various aspects of fire risk mitigation, training and emergency response through information and knowledge exchange. The proposed change is to expand and enhance this partnership to fund OCFA's lease of a Coulson-Unical CH-47 helitanker that is capable of dropping more water and/or retardant than any helicopter used by fire agencies in SCE's service area today. The helitanker would supplement the aircraft available to OCFA currently.

<sup>14</sup> Forecasted spend is provided for 2020, 2021-2022 forecasts will be provided in SCE's 2021 WMP Update submission.

This helitanker will be available for all wildfires across SCE's service area during the fourth quarter of 2020, but 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 the professional judgment of OCFA fire suppression beyond SCE's service area will maximize safety benefits or if OCFA directed otherwise by the appropriate governmental authorities.

SCE will fund the helitanker's fixed lease costs, which are expected to be approximately \$2.1 to \$2.5 million, for OCFA to have access to the aircraft during the fourth quarter of 2020. 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.

As described below, this is an emergent need in SCE's service area that requires SCE to modify and expand its approach. SDG&E and PG&E have similar partnerships with fire agencies in their respective service areas that have been approved in their respective WMPs.

## **II. Justification for the proposed change**

2020 has been a severe fire season already. Based on fuel conditions and weather forecasts across SCE's service area, 2020 is expected to continue to be one of the most active and intense fire seasons, even when compared to recent history. The fire agencies' fire suppression capabilities are strained with the large and coincident events. A successful aerial attack is essential to limit the spread of the fires, and to protect life and property (including SCE's physical assets) and to preserve delivery of critical and essential services such as electricity.

The larger the fires, the more ground resources are needed for response and suppression. Although the fire agencies in SCE's service area have committed significant ground resources, they are expected to be strained to adequately respond during the 2020 fire season. COVID-19 is putting additional pressures on the availability and dispatch of these ground resources. The speed and force of the initial aerial attack on fires will be critical to keep the fires contained so that the limited ground resources can have time to arrive and suppress the fires. More aerial fire suppression will be a critical aspect of these initial attacks.

OCFA recently retired two of its Super Huey helicopters due to safety concerns, thus further straining its fire suppression capability by more than 50%. While OCFA is still operating the two remaining medium-lift helicopters, this is grossly inadequate for the

expected need this year. Therefore, OCFA, in consultation with Los Angeles and Ventura County fire agencies, proposed leasing the Coulson-Unical CH-47 helitanker from Coulson Aviation.<sup>15</sup> 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.

Limiting the spread of fires and quicker suppression in SCE's service area is an important component of fire mitigation, and can reduce the potential of widespread and catastrophic damage and preserve public safety for SCE's customers. In addition, reducing the consequence of fires protects SCE's electrical facilities that its customers rely on, especially with the COVID-19 safer-at-home restrictions.

When SCE developed and submitted its 2020-2022 WMP, the severity of the 2020 fire season, the impact of COVID and the loss of use of available helicopters were unknown. Given these emergent factors, and ongoing collaboration with OCFA and other fire agencies, it is imperative that SCE partners in operationalizing a practical solution in the very near term to reduce the impact of fires on its communities, customers and facilities. SCE has looked into other options such as dual use aircrafts that can be available to SCE for its operations (such as inspections and maintenance) along with being available for fire suppression or leasing the helicopter(s) directly. Though SCE will pursue these options for the 2021 fire season and beyond, the expedited timeline of less than three weeks to address these emergent circumstances does not facilitate SCE pursuing these options in 2020. Therefore, SCE made the decision to pay for part of OCFA's costs to lease the Coulson-Unical CH-47 helitanker.

### **III. Change in expected outcomes from the proposed change**

- a. What outcomes, including quantitative ignition probability and PSPS risk reduction, was the changed initiative expected to achieve in the 2020 WMP?

As mentioned above, access to the helitanker will improve fire suppression capability in SCE's service area, thus reducing the potential consequence of fires including safety incidents, property damage (including damage to SCE's assets) and loss of critical infrastructure and essential services including electricity.

- b. What outcomes, including quantitative ignition probability and PSPS risk reduction, will the initiative deliver with the proposed adjustment?

Please see the sections above.

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<sup>15</sup> This helitanker is designed to drop up to 1,900 gallons of water/retardant on its first load and greater than 2,600 gallons on its last load (depending on elevation), which is more than other fire suppression helicopter on the market today. This helitanker is also capable of flying faster than some other heavy-lift fire suppression helicopters.

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

Sincerely,

//s//

Carla Peterman  
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Southern California Edison

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