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Docket# 2023-2025 WMP

Suzie Rose
Program Manager, Electric Safety Policy Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: SCE's Submission of Errata for the 2025 Wildfire Mitigation Plan Update

Dear Program Manager Rose:

SCE appreciates the opportunity to submit errata to its 2025 Wildfire Mitigation Plan Update (WMP Update). Please see the table on the following page for SCE's corrections.

SCE's WMP and associated materials are available at: <https://www.sce.com/safety/wild-fire-mitigation>.

SCE has included one substantive correction with this submission. SCE recognizes the deadline for substantive corrections has passed, but was not aware of this error until after that deadline.

SCE appreciates the opportunity to submit these corrections. If you have questions, or require additional information, please contact me at gary.chen@sce.com.

Sincerely,

//s//

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TABLE OF ERRATA

Substantive? (Y/N)	Section	Table or Figure	Page Number(s)	Description of correction	Reason for Correction
Y	1.3.5	Table 1-2	23	<p>Table 1-2 corrected for the top risk circuits ranked by PSPS risk score and the resulting percentage of PSPS risk.</p> <p>Note: this correction is also made to the full Excel version of Table 1-2, which is provided as a Supporting Document on www.sce.com/wmp.</p>	<p>Table 1-2 contained incorrect data. As SCE stated on April 29 in its response to the data request Cal Advocates 10, Question 2, SCE sorted Table 1-2 incorrectly by total PSPS Risk and not by Circuit-Mile-Weighted PSPS Risk Score.</p>
N	2.1	N/A	26	<p>Footnote #9 corrected to state that target risk reduction values are based on strive targets.</p>	<p>Original version of the footnote incorrectly stated risk reduction value is based on the compliance target in cases where a target has both a compliance and strive target.</p>
N	Table of Contents & 2.1	N/A	i & 28	<p>IN-9a name changed from “spans” to “splices”.</p>	<p>IN-9a name incorrectly used the term “spans” instead of “splices”.</p>

Redlines to address errors identified in the table above begin on the following page.

1.3.5 Updated Top Risk Circuits

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest-risk circuits, segments, or spans. If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information. Discussions of significant updates to risk models must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

Please see below for the first 10 rows of each table. The full versions are available in at available at www.sce.com/safety/wild-fire-mitigation.

Table 1-1: Top 5% Ignition Risk Circuits/Segments/Spans

Risk Rank	Circuit Name	Circuit-Mile-Weighted Ignition Risk Score	% of Total Ignition Risk in Top 5%
1	CRAWFORD	0.1941	4%
2	LOUCKS	0.1773	4%
3	ENERGY	0.1484	3%
4	PHEASANT	0.1441	3%
5	CERRITO	0.1350	3%
6	PELONA	0.1268	3%
7	AMETHYST	0.1264	3%
8	RANGER	0.1217	3%
9	LIMITED	0.1087	2%
10	CHAMPION	0.1083	2%
<i>please see SCE's WMP supporting documents for entire table</i>			

Table 1-2: Top 5% PSPS Risk Circuits/Segments/Spans

Risk Rank	Circuit Name	Circuit-Mile-Weighted PSPS Risk Score	% of Total PSPS Risk in Top 5%
1	HUBBLE	0.0115 0.0161	15.2% 14.9%
2	KONA	0.0056 0.0113	7.3% 10.5%
3	SLALOM TRI CITY	0.0051 0.0092	6.8% 8.5%
4	ROI-TAN SILVA	0.0042 0.0058	5.6% 5.4%
5	BOBSLED ROI-TAN	0.0031 0.0057	4.1% 5.3%
6	TRI-CITY SAUTERNE	0.0027 0.0055	3.6% 5.1%
7	SILVA SLALOM	0.0026 0.0053	3.4% 4.9%
8	SLOPE HOPE	0.0025 0.0036	3.3% 3.4%
9	VARGAS KANAN	0.0023 0.0030	3.1% 2.8%
10	SAUTERNE WIGWAG	0.0022 0.0024	2.9% 2.3%
<i>please see SCE's WMP supporting documents for entire table</i>			

SCE Table 2-11: 2025 Target Changes

Initiative Activity	Initiative ID	Change Category ⁶	Original Value ⁷ (compliance or strive) ⁸	Updated Value	Target Percentage Change	% Risk Impact: Original ⁹	% Risk Impact: Updated
Covered Conductor	SH-1	Lessons Learned, Other	700 circuit miles (compliance) 850 circuit miles (strive)	500 (compl.) 600 (strive)	-29%	4%	1.5%
Undergrounding Overhead Conductor	SH-2	Lessons Learned, Other	48 circuit miles (compliance)	30 (compl.)	-38%	N/A	N/A
REFCL – GFN	SH-17	Lessons Learned, Other	4 substations w/completed construction (compliance)	2 (compl.)	-50%	1.8%	1.8% ¹⁰
Transmission High Fire Risk-Informed (HFRI) Inspections and Remediations (Ground and Aerial)	IN-1.2	Lessons Learned, Other	28,000 structures (compliance)	24,500 (compl.)	-13%	N/A	N/A
Expanded Clearances for Generation Legacy Facilities	VM-3	Other	60 sites (compliance) 70 sites (strive)	48 (compl.) 56 (strive)	-20%	21%	25% ¹¹

Managing Wildfire Risk in the Context of Modified Grid Hardening Targets

Below, SCE proposes reductions to three of its central grid hardening mitigations. SCE explains the rationale behind each change, but also wishes to provide more general comments on its risk mitigation practices given the lead times and potential delays with hardening mitigations.

- SCE performs risk-prioritized inspections to identify maintenance issues that may lead to equipment failure at the highest frequency (at least once a year) of anywhere in its service area, significantly surpassing the minimum General Order 165 required frequency of once every five years.

⁶ Per OEIS criteria, the change category can be: lessons learned, internal policy changes, new laws or regulations, corrective actions resulting from Energy Safety’s compliance process, or other explanations.

⁷ From 2023-2025 Base WMP, version date Oct 26, 2023, available at <https://www.sce.com/safety/wild-fire-mitigation>.

⁸ In some cases, an initiative has two targets. SCE refers to the lower value as the “compliance” target and the higher value as the “strive” target. SCE only includes the values in this table that it proposes to change.

⁹ In cases in which a program has a strive target and a compliance target, the risk reduction is based on the **strive compliance** target.

¹⁰ The 1.8% risk reduction is based on the original compliance target, which SCE proposed to retain as a strive target, hence it remains unchanged.

¹¹ Although scope is decreasing from 70 to 56 sites, forecasted risk reduction increased due to updates to risk models.

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for 2025. While SCE will endeavor to achieve the original target to complete construction of GFN at four substations, SCE seeks to adjust the target based on developments that have occurred since SCE initially set the target in early 2023.

VM-3: Expanded Clearances for Generation Legacy Facilities

SCE seeks to reduce both the compliance target and strive target. SCE executed this program at 63 sites in 2023, exceeding both the compliance target of 50 sites and the strive target of 60 sites. Due to the volume of work completed in 2023, SCE anticipates a lower volume of work in 2025.

IN-1.2: Transmission High Fire Risk-Informed (HFRI) Inspections and Remediations (Ground and Aerial)

SCE seeks to reduce the compliance target based on lessons learned in 2022 and 2023 related to environmental and access issues that can influence SCE’s ability to perform a complete inspection. SCE plans to prioritize inspection resources to the highest-risk structures, as well as to make repeated efforts in situations in which the initial inspection attempt is incomplete. SCE does not seek to change the strive target.

Additional Update Regarding IN-9b: Transmission Conductor & Splice Assessment: ~~Spans~~ Splices with X-Ray

SCE seeks to communicate its intentions with this program even though it is not seeking to formally change the target. In Table 8-4 of the 2023-2025 WMP, the 2025 target for IN-9b is “Target to be developed based on an engineering analysis to be performed in 2023 and 2024.” SCE intends to continue IN-9b with a 2025 compliance target of 50 inspections and a 2025 strive target of 100 inspections, based on the value of the results of this program in results observed to date.

Redlines to Base WMP Due to Reportable Changes

Please see the table below for redlines in the 2023-2025 WMP due to the reportable changes discussed in this section.

Section	Table or Figure (if applicable)	Page Number(s)	Description of Redline
8.1.1.2	Table 8-3	238	Edits to SH-1 target to reflect changes.
8.1.1.2	Table 8-3	238	Edits to SH-2 target to reflect changes.
8.1.1.2	Table 8-3	241	Edits to SH-17 target to reflect changes.
8.1.2.1.1	N/A	252	Edits to narrative text to reflect SH-1 target changes.
9.1.4	Table 9-5	618	Edits to SH-1 target to reflect changes.
8.1.1.2	Table 8-4	242	Edits to IN-1.2 target to reflect changes.
8.2.1.2	Table 8-14	378	Edits to VM-3 target to reflect changes.