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March 3, 2023

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Revised Q4 2022 Wildfire Mitigation Data Tables 1-15

Dear Director Thomas Jacobs,

Pursuant to the Office of Energy Infrastructure Safety's (Energy Safety) guidance, on March 2, 2023, SCE submitted revised Q4 2022 Wildfire Mitigation Data Tables 1-15 to Energy Safety via the 2022 QDR docket. SCE inadvertently did not provide a cover letter for this revision as required by the Data Guidelines. This letter provides the information required in Section 2.4, Revisions to Previously Submitted Data of the Data Guidelines.

The following updates have been made to SCE's Q4 2022 Wildfire Mitigation Data Tables 1-15:

Table 7: State of service territory and utility equipment

- Columns Impacted:
 - W, X and Y for 2023-2025 Projection Forecasts
 - AB for Blank Meaning Comments.
- Rows Impacted: 10 -189
- Description: In SCE's original Q4 2022 submission of the non-spatial QDR, SCE did not provide 2023-2025 projections for any Table 7 metrics. SCE is resubmitting Table 7 with all Table 7 projections populated. SCE has also removed its previous comments in the Blank Meaning Column AB for all rows which previously pointed Energy Safety to Table 8 for these projection counts.
- Explanation: SCE aligned its projection methodology for Table 7 with that of the other IOUs in order to provide projections for

Overhead/Underground Circuit Miles, Counts of AFN, Critical Facilities, Residential/Commercial customers, Substations and Weather Stations.

Table 11: Mitigation Initiative Financials

The following updates were made to Table 11:

- **Utility Initiative Tracking ID (Column C)**
 - Impacted Rows: 11, 12, 13, 16, 17, 22, 24, 25, 29, 30, 34, 35, 36, 37, 38, 39, 40, 41, 46, 49, 51, 52, 53, 54, 55, 57, 58, 59, and 60.
 - Explanation: In the previous submission of Table 11, the cells in column C were populated with Tracking IDs only (i.e., activities with a compliance identifier such as SH-1, SA-3, VM-3, etc.). Based on discussion and feedback from Energy Safety, the empty cells in the column were populated with initiative activity numbers which reference the specific section in SCE's pre-submission 2023-2025 WMP.
- **Primary Driver Targeted (Column D) and Secondary Driver Targeted (Column E)**
 - Impacted Rows: 10, 11, 12, 13, 14, 15, 16, 17, 18, 22, 24, 25, 28, 30, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 44, 45, 46, 49, 51, 52, 53, 54, 55, 56, 57, 58, 59, and 60.
 - Explanation: The impacted rows were previously blank/empty. For clarification, SCE inserted the following description: *Driver Targeted fields left blank as the activity 1) impacts wildfire or PSPS risk consequences, and not risk drivers or 2) is not a wildfire risk mitigation activity or 3) does not directly reduce wildfire risk and is considered a foundational item.*
- **If New: Memorandum Account (Column H)**
 - Impacted Row(s): Rows 10 through 60.
 - Explanation: The impacted rows were previously blank/empty. For clarification, SCE inserted the following description: *CPUC-approved memorandum accounts will be used to track costs for this activity to the extent SCE records costs above GRC-authorized levels, pursuant to SCE's incrementality methodology.*
- **Current compliance status - In / exceeding compliance with regulations (Column I) and Associated rule(s) - if multiple, separate by semi-colon - ";" (Column J)**
 - Impacted Row(s): Rows 10 through 60.
 - Explanation: The impacted rows were previously blank/empty. For clarification, SCE inserted the following description with reference to the specific section of the pre-submission 2023-2025 WMP: *Please refer to section XX of SCE's pre-submission 2023-2025 WMP.*

- **Blank Meaning (Column AO)**

- Impacted Row(s): 12, 13, 22, 25, 28, 34, 35, 38, 46, 49, 51, 52, 53, 55, 58, and 59.
- Explanation: In the previous submission of Table 11, the template provided by Energy Safety had a drop-down list within each cell of Column AO. Based on discussion and feedback from Energy Safety, SCE was advised to remove the dropdown list and to add an explanation for why dollars in the impacted rows are blank. As such, SCE has added descriptions in Column AO consistent with Energy Safety's guidance.

SCE appreciates the opportunity to submit a revision of the Q4 2022 Wildfire Mitigation Data Tables 1-15. If you have any questions, or require additional information, please contact me at michael.backstrom@sce.com.

Sincerely,

//s//

Michael A. Backstrom
VP Regulatory Affairs
Southern California Edison