

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE STATE OF CALIFORNIA**

**OPENING COMMENTS OF THE UTILITY REFORM NETWORK
ON SOUTHERN CALIFORNIA EDISON COMPANY'S
2023-2025 WILDFIRE MITIGATION PLAN**



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SUMMARY OF RECOMMENDATIONS

1. Energy Safety should require SCE to make the following changes to its WMP in order to gain approval:
 - a. Undergrounding must be viewed as a targeted mitigation measure for the highest risk circuits where it is cost-effective. SCE should ensure that at least 80% of undergrounding miles are deployed to the top 20% of wildfire risk, based on the most up to date modeling results. (See TURN's Comments on PG&E's WMP, Section IV.)
 - b. In choosing among system hardening alternatives – which should include undergrounding, covered conductor and covered conductor coupled with other ignition limiting technologies -- SCE must make a location-specific determination of the best alternative for that location, based on the specific risk factors present in the location.
 - c. The location-specific selection among system hardening alternatives must expressly consider the extent to which the execution and schedule risks for undergrounding described in PG&E's 2021 WMP (see TURN's Comments on PG&E's WMP, Section III.B.3) are present in the location and recognize the benefits of deploying an alternative that will achieve risk reduction sooner than other alternatives.
 - d. The location-specific selection among alternatives must include a comparison of the location-specific cost-effectiveness of each alternative, based on the RSE measure. If the utility wishes to select an alternative that does not have the highest RSE, it must show special and compelling circumstances that justify deployment of a lower RSE alternative in that location.
 - e. SCE must present a revised system hardening plan for 2023-2025 that it has developed using a process that complies with the preceding requirements. The revised plan should include workpapers showing how SCE determined its target mileage consistent with the above requirements for each of the system hardening alternatives it proposes in its revised plan.
2. The following deficiencies should be corrected in SCE's next WMP submission:
 - a. SCE should describe its policy for undergrounding of secondary conductor and services and discuss its expectations for whether poles will be removed in

- underground locations. The discussion should address the effect that remaining overhead wires and poles in locations with undergrounding have on the effectiveness of undergrounding in reducing risk generally and specifically risk associated with ingress and egress in locations where fire is present, whether or not ignited by utility facilities.
- b. In order to develop realistic data-based underground to overhead conversion factors, SCE should be required to maintain a database of actual results from SCE's undergrounding projects that identifies, for each project, the underground miles deployed and the miles of overhead conductor replaced. In addition, as applicable, the database should describe the reasons that undergrounding needed to deviate from the direct overhead path. (See TURN's Comments on PG&E's WMP, Section VI.A regarding the importance of an accurate conversion factor.)
 - c. To have data to compare the reliability of undergrounded facilities to overhead hardened facilities, SCE should be required to keep separate reliability measures (e.g., SAIFI and MAIFI) for overhead circuit segments with covered conductor. (See TURN's Comments on PG&E's 2023-2025 WMP, Section VI.C.)

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ON SOUTHERN CALIFORNIA EDISON COMPANY’S
2023-2025 WILDFIRE MITIGATION PLAN**

The Utility Reform Network (“TURN”) submits these comments on the 2023-2025 Wildfire Mitigation Plan (WMP) submitted by Southern California Edison Company (“SCE”).

I. SCE’S PREFERENCE FOR UNDERGROUNDING IN SCE-DENOMINATED ‘SEVERE RISK AREAS’ IS LIKELY TO RESULT IN EXCESSIVE UNDERGROUNDING FOR LOCATIONS WHERE COVERED CONDUCTOR WOULD BE THE BEST AND MOST COST-EFFECTIVE CHOICE

SCE reports that, as of the end of 2022, it has installed covered conductor on more than 4,400 circuit miles, which is over 44% of its HFRA.¹ According to SCE, it has achieved great success with covered conductor: there have been no fires associated with covered conductor caused by the risk drivers that covered conductor was designed to address, and it experienced 53% less tree-caused electrical faults.² SCE also touts a 70% reduction in PSPS minutes, outages and de-energizations over the 2020-2022 period.³ Even greater risk reduction can be expected when SCE supplements covered conductor with new ignition limiting technologies such as Early Fault Detection (EFD) and Rapid Earth Fault Current Limiter (REFCL); SCE refers to this combination of mitigations as Covered Conductor (CC)++.⁴ SCE is now estimating that the combination of covered conductor and REFCL has mitigation effectiveness percentages approaching those of undergrounding, such as 95% for conductor damage or failure and 85% for vegetation contact.⁵

¹ SCE 2023-2025 WMP, p. 2.

² *Id.*, p. 3.

³ *Id.*

⁴ *Id.*, pp. 6, 205.

⁵ SCE response to MGRA Data Request (DR) 3, question 2. All SCE data request responses cited in these comments are available at: <https://www.sce.com/safety/wild-fire-mitigation>

Despite the success of covered conductor to date and the prospects for CC++ to be an even more effective wildfire mitigation, SCE proposes in its WMP a new policy in which undergrounding would be the preferred mitigation in areas it designates as “severe risk areas” (SRA).⁶ Based on this new policy, SCE proposes to ramp up the number of overhead miles replaced by undergrounding from 11 in 2023 to 16-20 in 2024 and 48-60 in 2025.⁷ It should be noted that the actual number of underground miles needed to replace these overhead miles will be higher because of the circuitous routing that is often necessary when replacing overhead conductor.⁸ This is a key factor that drives up the cost of undergrounding compared to covered conductor.

As discussed below, SCE has not justified its new policy preference for undergrounding over covered conductor in SRAs, as opposed to the location-specific selection process Energy Safety directed PG&E to use in the decision on PG&E’s 2022 WMP. SCE’s policy can be expected to lead to excessive use of undergrounding in locations where covered conductor or CC++ would be the best and most cost-effective system hardening alternative.

A. SCE Has Failed to Demonstrate that any Proposed Project in a Severe Risk Area Should Be Entitled to a Presumption that Undergrounding Is the Best System Hardening Alternative

SRAs are defined by SCE, using the following criteria:

1. Population egress constraints, high fire frequency, and burn-in buffer into egress locations.
2. Significant fire consequence – Acres burned consequence greater than 10,000 over an 8-hour unsuppressed model simulation.

⁶ SCE 2023-2025 WMP, p. 5.

⁷ *Id.*, p. 257.

⁸ SCE WMP, pp. 256-257.

3. High winds – Location, which if fully covered with covered conductor, would still be subject to high PSPS likelihood.
4. Communities of Elevated Fire Concern - Smaller geographic areas where terrain, construction, and other factors could lead to smaller, fast-moving fires threatening populated locations under benign (normal) weather conditions.⁹

Importantly, if *any* of these criteria are present, the circuit mile is assigned SRA status.¹⁰

As a result, a broad swath of SCE’s HFRA circuit miles, 30%, meets SCE’s SRA definition.¹¹

SCE fails to provide a satisfactory explanation as why the presence of any of these factors should automatically justify a preference for undergrounding over covered conductor or CC++ for such a high percentage of its HFRA. SCE offers only a vague defense of its policy:

For Severe Risk Area locations, the threat to lives and property is elevated to such an extent that SCE has determined that for public safety reasons it is prudent to not just significantly reduce ignition risk expeditiously but minimize it in the long term to the extent practicable. Therefore, undergrounding is preferred unless covered conductor has already been installed or specific terrain or local issues require alternatives such as covered conductor with supplementary mitigations.¹²

Vague appeals to “public safety reasons” do not explain why undergrounding should be preferred over CC++, a much less costly, but nearly as effective mitigation. Notably, SCE’s “high winds” SRA criteria does not assess whether CC++ would reduce the likelihood of PSPS in the area in question. And none of the SRA criteria relate to the prevalence of potential “strike trees” in the location, a factor that may, depending on the other local considerations, militate in favor of undergrounding.

⁹ *Id.*, p. 103.

¹⁰ Information shared by SCE’s representative at the April 28, 2023 Workshop.

¹¹ SCE WMP, p. 114, based on 2,925 SRA miles divided by 9,600 total HFRA miles.

¹² *Id.*, p. 205.

SCE’s preference for undergrounding in SRAs has similarities to (although is not as egregious as) the “default-to-undergrounding” approach that Energy Safety warned PG&E against in Area of Continuing Improvement (ACI) 22-34 in the decision on PG&E’s 2022 WMP. Energy Safety’s criticisms and its direction to PG&E in ACI PG&E-22-34 are discussed in detail in Section III.A of TURN’s accompanying comments on PG&E’s 2023-2025 WMP. In broad summary, Energy Safety criticized PG&E for : “heavily favoring” undergrounding; not engaging in a location-specific analysis of the “multitude” of risk factors when choosing among system hardening alternatives, including combinations of alternatives; not comparing project-level RSEs of alternative mitigations early in the decision-making process (discussed further in Section II.B below); and placing too much emphasis on whether undergrounding is feasible.

SCE’s SRA-based preference for undergrounding may be somewhat more limited in geographic scope than PG&E’s approach, but still shares all of the qualities that Energy Safety directed PG&E to correct. The types of factors that are highlighted in SCE’s SRA designation may be relevant considerations when choosing among alternatives, but the existence of one of more of these factors should be weighed, on a location-specific basis, against all other relevant factors and should not be determinative. SCE’s statement that undergrounding is preferred unless specific terrain or local issues *require* alternatives sounds like PG&E’s policy of selecting undergrounding unless it is found to be infeasible.

Just as Energy Safety found PG&E’s undergrounding-first approach unacceptable, so too should it reject SCE’s proposed policy of favoring undergrounding in SRAs.

B. SCE Does Not Compare RSEs of Alternative Mitigations at the Project Level Before Selecting an Alternative

As noted in Section II.A, Energy Safety informed PG&E in 2022 that its practice of not considering project-level RSEs for mitigation alternatives was a deficiency that needed to be

corrected. SCE's new proposed policy suffers from the same shortcoming. In discovery, TURN asked SCE to provide, for any planned undergrounding project for 2023-2025, the RSE it calculated for undergrounding, covered conductor and CC++. SCE responded that it has not calculated project-level RSEs.¹³ RSEs are not useful for choosing the best mitigation for a given location unless they are calculated for the project in question *before* selecting the mitigation.

SCE's current policy of only calculating "program-level" RSEs is contrary to this goal. SCE's program-level RSEs are calculated based on the programs SCE has designed *after* SCE has decided where to deploy undergrounding and covered conductor. Under SCE's new SRA policy, undergrounding is selected as a matter of preference in the highest risk locations, and covered conductor is generally reserved for lower risk locations. As a result, these after-the-fact, program level RSEs will make the undergrounding RSEs look more competitive with covered conductor. However, in a head-to-head RSE comparison *for the same location*, covered conductor and CC++ can be expected to have significantly higher RSEs than undergrounding in most instances because the costs of undergrounding are so much higher.

TURN is not suggesting that RSEs must be determinative of the system hardening selection in all cases. SCE states in its WMP that it agrees with the statement of CPUC Staff that "mitigations are usually selected based on the highest risk spend efficiency score unless there may be some identified resource constraints, compliance constraints, or operational constraints that may favor another candidate with a lower RSE."¹⁴ But SCE's suggestion that a mitigation with a lower RSE should be chosen just because it "reduces more overall risk even if it costs

¹³ SCE response to TURN DR 1, question 5. *See also* SCE response to TURN DR 3, question 1 ("SCE quantifies RSE at a program level and does not calculate RSE on a project basis for TUG, covered conductor, and other alternatives.")

¹⁴ SCE WMP, p. 203.

more”¹⁵ goes well beyond the idea of constraints identified in the quote from CPUC staff and negates the very purpose of RSE. SCE’s approach takes cost out of the equation entirely, transforming RSE into just a measure of risk reduction. In a hypothetical world of infinite resources, cost can be ignored, but in the real world, cost-effectiveness in achieving risk reduction must be given due weight.

Accordingly, SCE’s current policy should be rejected. Instead, SCE should be directed to compare RSEs at the project level before choosing a system hardening mitigation. If the utility wishes to select an alternative that does not have the highest RSE, it must show special and compelling circumstances, such as the types of constraints identified in the quote above from CPUC staff, that justify deployment of a lower RSE alternative in that location.

II. SCE SHOULD BE REQUIRED TO ADDRESS THE IMPACT ON THE ESTIMATED RISK REDUCTION FROM UNDERGROUNDING RESULTING FROM THE FACT THAT A SIGNIFICANT AMOUNT OF POLES AND WIRES WILL REMAIN ABOVE-GROUND EVEN WHERE UNDERGROUNDING HAS OCCURRED

SCE’s WMP does not address the fact that, even in locations where undergrounding has occurred, a significant amount of poles and some wires may remain above ground. In discovery, SCE informed TURN that, for its planned undergrounding projects in 2023, it estimates that “at a minimum” approximately 76% of the poles in the affected circuits will remain.¹⁶ (SCE said it was unable to provide an estimate for 2024 and 2025.) SCE explains that “these poles are co-located with 3rd party equipment, subtransmission lines, and/or service conductor.”¹⁷ With respect to conductor, SCE says secondary overhead lines will generally be removed “where

¹⁵ *Id.*

¹⁶ SCE response to TURN DR 2, question 5.

¹⁷ *Id.*

feasible”¹⁸ and identifies various criteria that it will use to decide whether to remove overhead service connections.¹⁹ Thus, some unknown percentage of overhead conductor may also be left above ground. In short, because of the remaining poles and wires, the “after” picture of undergrounding may not look as different from the “before” picture as may be expected.

As a result, the risk reduction benefits of undergrounding will likely be less than expected. The remaining poles and wires are susceptible to falling and blocking ingress and egress routes during a fire. One criteria for SCE’s SRAs is whether the area has egress concerns. Because of leftover poles and wires, undergrounding may not reduce as much of the egress-related risk as SCE seems to assume. SCE should be required to address the effect that remaining overhead wires and poles in locations with undergrounding have on the estimated risk reduction from undergrounding generally, and specifically the risk associated with ingress and egress in locations where fire is present, whether or not ignited by utility facilities.

III. ENERGY SAFETY MUST ENSURE THAT ITS RESOLUTION OF THIS WMP RESPECTS THE CPUC’S RESOLUTION OF THE AUTHORIZED SIZE AND FUNDING FOR WILDFIRE MITIGATION ACTIVITIES

A. Pending Related CPUC Proceedings

As Energy Safety and the CPUC know, the decisions of the two agencies both address matters relating to the appropriate size of wildfire mitigation programs, and thus must be carefully coordinated. For this reason, this section begins by discussing the parallel proceedings at the CPUC that relate to SCE’s wildfire mitigation proposals for 2023-2025. Because SCE’s system hardening proposals are particularly costly, this section will specifically address the status of those proposals at the CPUC. Because of special circumstances relating to the

¹⁸ SCE response to TURN DR 2, question 4.

¹⁹ SCE response to TURN DR 2, question 3.

transition from SCE’s 2021 general rate case to its recently-filed 2025 general rate case, this discussion requires a year-by-year description.

For 2023, SCE has already gained CPUC approval of the 11 overhead circuit miles that it plans to underground that are identified in SCE’s WMP.²⁰ With respect to SCE’s covered conductor plan, the CPUC has addressed the standard that SCE will be required to meet to obtain cost recovery for covered conductor deployment that exceeds the mileage that was authorized in D.21-08-036. Specifically, the CPUC stated that SCE “will have the burden to affirmatively establish further covered conductor deployment is justified” beyond the 4,500 miles for 2019-2023 authorized in that decision.²¹

For 2024, a pending “Track 4” phase of SCE’s 2021 GRC (A.19-08-013) will determine the authorized size and funding for covered conductor, undergrounding, and other wildfire mitigation programs. This proceeding is expected to be resolved in the coming months.

For 2025, SCE filed a general rate case (GRC) on May 12, 2023 in which it presented its request for the size and funding level for undergrounding and covered conductor, as well as other wildfire mitigation programs, for the period 2025-2028. Other parties have not yet responded and the schedule for the submission of intervenor testimony, evidentiary hearings and briefs has not yet been determined. However, a decision is anticipated no earlier than the fourth quarter of 2024.

²⁰ CPUC Decision (D.) 21-08-036, p. 214.

²¹ D.21-08-036, p. 201.

B. The Decision on this WMP Must Respect the Careful Balance that the CPUC Must Strike in Its Decisions

In each of the above-described proceedings, the CPUC will render a decision based on an extensive evidentiary record to determine which wildfire mitigation programs, in what size, should be funded by ratepayers. Pursuant to Public Utilities Code Section 451, the CPUC must find that SCE has met its burden of demonstrating that its requested costs are “just and reasonable” before those costs can be approved for recovery in rates.²²

These CPUC decisions will require it to strike a careful and thoughtful balance among a variety of competing considerations, in determining the activities and costs that warrant ratepayer funding. The important factors that need to be balanced include: safety and reliability; the plethora of other activities that require ratepayer funding that are not at issue in this WMP; preventing SCE’s energy services from becoming unaffordable and therefore unusable for more households; and achievement of California’s greenhouse gas reduction goals, which depend on customers switching to electric-powered appliances and vehicles and which would be undermined by unaffordable electricity rates. Unless affirmative care is taken to ensure consistency between the two decisions, the resolution of this WMP risks undermining the careful balance that the CPUC will need to strike in its decisions.

The need for consistency is evident when one considers the possibility of a WMP decision that approves a WMP with programs that are larger in scope than what the CPUC approves in the pending CPUC cases. Using undergrounding as an example, if the approved WMP has mileage targets that are greater than the undergrounding mileage the CPUC ultimately

²² The applicability of the CPUC’s just and reasonable standard to wildfire mitigation plan costs is reinforced in Public Utilities Code Section 8386.4(b)(1), which provides that “[t]he commission shall consider whether the cost of implementing each electric corporation’s [wildfire mitigation] plan is just and reasonable in its general rate case application.”

approves, SCE can be expected to record the costs of additional mileage beyond the GRC authorized level in the WMP memorandum account created pursuant to Public Utilities Code Section 8386.4(a). At some point in the future, SCE can then be expected to use the approved WMP to seek rate recovery through a CPUC application for this additional amount of undergrounding, unless its regulators make clear that such an effort would be futile. From the perspective of ratepayers, a highly troubling outcome would be that the CPUC feels compelled to approve the additional funding because SCE was never informed that its WMP approval would not be allowed to justify rate recovery for undergrounding beyond what was authorized in the GRC. Even the best possible outcome of such a scenario would be undesirable from ratepayers' perspective -- the unnecessary expenditure of limited agency and stakeholder resources to obtain a decision denying such a request. Put simply, WMPs should not be allowed to circumvent the CPUC's statutory obligation to constrain utility spending plans to keep rates just, reasonable and affordable.

The decision on this WMP can avoid these undesirable scenarios by making clear that the WMP process does not permit a utility to circumvent a CPUC GRC decision that determines the authorized size of a wildfire mitigation activity. To allow the WMP process to provide utilities another bite at the ratepayer funding apple would be extremely poor policy and a waste of limited agency and stakeholder resources. It would also be illegal, as only the CPUC has authority to determine what can be put into utility rates. The CPUC's GRC decisions that carefully weigh and resolve a variety of competing considerations, including affordability, should not be undermined by a WMP decision that is not designed or intended to address any factors other than wildfire safety.

Energy Safety can avoid undermining the CPUC’s decisions by including clear guidance regarding the intent and effect of the WMP decision. Specifically, the decision on this WMP should state the following:

- In instances when the CPUC determines the authorized scope of a wildfire mitigation activity that may be recovered in rates, the WMP decision does not authorize a utility to perform additional work beyond what is authorized in the GRC;
- If a utility nevertheless chooses to perform work beyond what the CPUC approves, it should be aware that the WMP decision will not be allowed to serve as justification for rate recovery for the additional work.

In this way, while a utility is not prohibited from doing work beyond CPUC authorized levels, it is put on notice that it will not be allowed to use the WMP decision as a reason to override the funding limitations prescribed in a CPUC decision.

Balancing the competing objectives in achieving just, reasonable and affordable utility rates while achieving safe and reliable service is challenging. To achieve an optimal balance of those competing goals, Energy Safety and the CPUC must make clear that they will ensure consistency in their decisions.

IV. TURN’S RECOMMENDATIONS

A. To Gain Approval, SCE Should Be Required to Change Its System Hardening Decision-Making Process and Re-Scope Its System Hardening Programs

The foregoing has shown that, taking its cue from PG&E in its 2022 WMP, SCE has adopted a policy in which undergrounding is the preferred system hardening alternative in SRAs, notwithstanding the many reasons why covered conductor is the best and most cost-effective choice in most locations. As noted, in response to PG&E’s 2022 RSE, Energy Safety directed PG&E in ACI PG&E-22-34 to revise its process of selecting wildfire mitigations to avoid a “default to undergrounding approach” and to select system hardening alternatives based on a

location-specific analysis of the multitude of factors that need to be considered, and to take into account RSE estimates and risk model outputs at a project level early in the decision-making process.²³

This is a critical time in California's efforts to prevent utility-caused wildfires. We cannot afford to squander our limited resources on a plan that unduly favors undergrounding even though in many, if not most locations, undergrounding is likely to be less cost-effective and slower to deploy than overhead hardening.

Thus, Energy Safety should direct SCE to fix the serious problems in its WMP now, before it can be approved. SCE was aware from ACI PG&E-22-34 of Energy Safety's requirements for a reasonable process for selecting among mitigation alternatives but elected not to heed that direction. Specifically, Energy Safety should require SCE to make the following changes in order to gain approval:

- Undergrounding must be viewed as a targeted mitigation measure for the highest risk circuits where it is cost-effective. SCE should ensure that at least 80% of undergrounding miles are deployed to the top 20% of wildfire risk, based on the most up to date modeling results. (See TURN's Comments on PG&E's WMP, Section IV.)
- In choosing among system hardening alternatives – which should include undergrounding, covered conductor and covered conductor coupled with other ignition limiting technologies -- SCE must make a location-specific determination of the best alternative for that location, based on the specific risk factors present in the location.
- The location-specific selection among system hardening alternatives must expressly consider the extent to which the execution and schedule risks for undergrounding described in PG&E's 2021 WMP (see TURN's Comments on

²³ See TURN's accompanying Comments on PG&E's 2023-2025 WMP, Section III.A.

PG&E's WMP, Section III.B.3) are present in the location and recognize the benefits of deploying an alternative that will achieve risk reduction sooner than other alternatives.

- The location-specific selection among alternatives must include a comparison of the location-specific cost-effectiveness of each alternative, based on the RSE measure. If the utility wishes to select an alternative that does not have the highest RSE, it must show special and compelling circumstances that justify deployment of a lower RSE alternative in that location.
- SCE must present a revised system hardening plan for 2023-2025 that it has developed using a process that complies with the preceding requirements. The revised plan should include workpapers showing how SCE determined its target mileage consistent with the above requirements for each of the system hardening alternatives it proposes in its revised plan.

B. SCE Should Be Directed to Address Additional Issues Raised by Its WMP

The following issues do not necessarily warrant rejection of SCE's current WMP, but should be addressed in SCE's next WMP submission:

- SCE should describe its policy for undergrounding of secondary conductor and services and discuss its expectations for whether poles will be removed in underground locations. The discussion should address the effect that remaining overhead wires and poles in locations with undergrounding have on the effectiveness of undergrounding in reducing risk generally and specifically risk associated with ingress and egress in locations where fire is present, whether or not ignited by utility facilities.
- In order to develop realistic data-based underground to overhead conversion factors, SCE should be required to maintain a database of actual results from SCE's undergrounding projects that identifies, for each project, the underground miles deployed and the miles of overhead conductor replaced. In addition, as

applicable, the database should describe the reasons that undergrounding needed to deviate from the direct overhead path. (See TURN's Comments on PG&E's WMP, Section VI.A regarding the importance of an accurate conversion factor.)

- To have data to compare the reliability of undergrounded facilities to overhead hardened facilities, SCE should be required to keep separate reliability measures (e.g., SAIFI and MAIFI) for overhead circuit segments with covered conductor. (See TURN's Comments on PG&E's 2023-2025 WMP, Section VI.C.)

V. CONCLUSION

For the reasons set forth above, TURN urges Energy Safety to adopt the recommendations in these Comments.

Date: May 26, 2023

Respectfully submitted,

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