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Docket# 2023-2025-WMPs

September 29, 2023

Shannon O'Rourke
Deputy Director, Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Reply to Comments on SCE's 2023-2025 Wildfire Mitigation Plan Draft Decision

Dear Deputy Director O'Rourke:

SCE respectfully submits this reply to comments submitted by various parties on September 19, 2023 regarding the Draft Decision on SCE's 2023-2025 Wildfire Mitigation Plan (WMP). SCE's silence on a particular issue or point raised in the comments should not necessarily be construed as tacit assent.

1. ENERGY SAFETY SHOULD ALLOW FOR FURTHER DIALOGUE AND FLEXIBILITY IN HOW TO MODEL AND USE MAXIMUM WILDFIRE CONSEQUENCE VALUES

In regard to ACI SCE-23-02, the Green Power Institute (GPI) states that the ACI will not "improve wildfire risk planning standards" and that "averaging of the utilities' different model input or output data sets will result in different and in some cases nonsensical values."¹ Mussey Grade Road Alliance (MGRA) states that the ACI and its accompanying narrative in the Draft Decision needs to be revised to address technical inaccuracies and "avoid a serious and in fact dangerous error"² of averaging wildfire consequences and thus understating potential outcomes.

SCE agrees with MGRA and GPI that the ACI's requirement for probability distributions or average consequence values is problematic. Maximum consequence outcomes help identify the types of low-probability, high-consequence events that have harmed Californians in recent years.³ This is important, as such events could be missed or otherwise obscured by looking solely at averages or probability-adjusted values. Such an outcome would not be consistent with the state's policy on wildfire risk mitigation as stated by the California Legislature. Senate Bill 901⁴ states that utilities should provide "a description of the preventive strategies and programs to be adopted by the electrical corporation to minimize the risk of its electrical lines and equipment causing *catastrophic*

¹ GPI Comments, pages 15-16.

² MGRA Comments, pages 9-10.

³ 2020 Fire Siege, Cal Fire, [web link](#).

⁴ California Senate Bill No. 901, Sec. 38, 8386(b)(c)(3), [web link](#).

wildfires, including consideration of dynamic climate change risks” (emphasis added). This language indicates that the California Legislature intended for utilities to evaluate and mitigate risk for catastrophic, not average, consequences.

SCE’s use of maximum consequences in wildfire risk modeling is important in identifying the riskiest areas of our system and in selecting appropriate mitigations to address that risk. To do this, SCE evaluates risk at the structure and line segment level; SCE does not aggregate risk scores to the circuit or system level to determine the appropriate mitigation to deploy, nor to inform the prioritization of grid hardening mitigations. These hardening decisions are made at a more local level, and do not involve the type of aggregation described in this ACI.

With respect to the aggregation described in this ACI, more discussion is needed as to why SCE’s current approach is not sufficient or results in incorrect mitigation decisions, specifically as it relates to aggregation of structure and circuit segment risk scores to circuit or system-level risk. SCE’s method is oriented toward pragmatic, project-level insight, in alignment with the S-MAP principles that risk analysis should be performed at a level consistent with how the utility makes decisions.⁵

As SCE stated in its initial comments,⁶ the ACI should be revised to allow SCE to explain its reasoning and approach for modeling wildfire consequence outcomes, as opposed to prescribing a specific methodology. Furthermore, the quantity and range of comments on this topic support SCE’s point that consequence modeling approaches are nuanced and appropriate for discussing in collaborative forums such as the risk modeling working group.

2. SCE’S APPROACH TO UNDERGROUNDING IS HIGHLY TARGETED AND SUPPORTED BY EVALUATION OF RISK REDUCTION, LOCAL CONDITIONS, AND ALTERNATIVES

TURN incorrectly characterizes the Draft Decision and makes unsupported statements that SCE “unduly jeopardizes safety,”⁷ and that SCE’s WMP has “fundamental deficiencies that undermine wildfire safety.”⁸

Contrary to TURN’s unsupported arguments, SCE has developed a highly focused and targeted approach to undergrounding, with only about six percent of its HFRA circuit miles scoped for undergrounding. As SCE discussed in reply to comments on its 2023-2025 WMP,⁹ SCE’s scope of undergrounding targeted circuits in Severe Risk Areas is limited to areas where potential wildfire consequences to human life and property can be catastrophic due to egress and other local risk factors. SCE’s evaluation involves detailed reviews by subject matter experts to look for the presence of risk drivers, including but not limited to heavy trees, local fuel regime, prevailing wind

⁵ CPUC Decision 18-12-014, Dec 20, 2018, Phase Two Decision Adopting Safety Model Assessment Proceeding (S-MAP) Settlement Agreement with Modifications, Appendix A, page A-11, [web link](#).

⁶ See proposed language in SCE Comments, pages 1-2, [web link](#).

⁷ TURN Comments, page 3.

⁸ TURN Comments, page 4.

⁹ SCE’s Reply to Comments Regarding SCE’s 2023-2025 Wildfire Mitigation Plan, 6/6/23, page 2-3, [web link](#).

direction and intensity, local fire ecology, and local road accessibility. Additionally, technical reviewers consider lead times, feasibility, and constructability in the decision-making process.

SCE's approach to undergrounding does not place the public at increased risk from wildfires as TURN alleges. SCE responsibly manages interim wildfire risk that can remain prior to undergrounding a circuit. SCE utilizes Probability of Ignition (POI) as one of the main factors for prioritizing SCE's vegetation management and inspection programs, which helps identify and mitigate near-term circuit conditions to reduce the wildfire potential and consequences until they can be all but eliminated with the completion of targeted undergrounding. This near elimination of wildfire risk cannot be achieved by covered conductor, REFCL, or other emerging technologies and is particularly appropriate in highest risk areas, especially considering that the risk of catastrophic wildfire is likely to increase, not decrease, as climate change worsens.

As stated in SCE's initial comments¹⁰ in response to the ACI for this topic (SCE-23-09) in the 2025 WMP Update, SCE welcomes the chance to further explain interim mitigation strategies and the analysis of undergrounding alternatives in its approach to hardening Severe Risk Areas. But SCE respectfully requests the exclusion of language from the ACI that suggests its current analysis is inadequate and that undergrounding is a default choice when this is clearly not the case and limited to a small percentage of SCE's service area.

3. SCE'S USE OF PROBABILITY OF IGNITION IS APPROPRIATELY BASED ON WHERE POI CAN PROVIDE THE MOST INSIGHT INTO WILDFIRE RISK

Cal Advocates states that SCE "diverges from industry-standard practices in risk assessment methodology" by "[failing] to consider both the likelihood of ignition and the potential impact of wildfires."¹¹ Cal Advocates suggests a roadmap for SCE to transition its approach, along with an evaluation of SCE's approach by a third party, to address Cal Advocates' concern that SCE's current approach "may lead to wildfire mitigation decisions that are less cost effective and less beneficial to customers."¹²

SCE respectfully disagrees with Cal Advocates' statement and suggestions. Cal Advocates may not fully recognize how SCE does in fact use POI. SCE considers both the likelihood of ignition and potential impact of wildfires. SCE actively uses POI to inform near-term wildfire mitigations such as inspections and vegetation management. However, as SCE stated in its reply to comments on its 2023-2025 WMP, POI is dynamic and changes over time and as a result "it is not optimal to rely on POI for long-term, capital-intensive mitigations such as targeted undergrounding."¹³ This is particularly true in areas of highest need for risk reduction due to the potential for catastrophic wildfires. Therefore, SCE focuses its initial evaluation of risk in Severe Risk Area on the potential impact of wildfires.

¹⁰ SCE Comments, pages 3-4.

¹¹ Public Advocates Office (PAO) Comments, pages 3-4.

¹² PAO Comments, page 4.

¹³ SCE's Reply to Comments Regarding SCE's 2023-2025 Wildfire Mitigation Plan, 6/6/23, page 2.

Cal Advocates also does not support its claim that quantitative modeling changes are warranted given SCE's existing practice of manually reviewing the outputs of its risk model and Severe Risk Areas. Subsequent to its initial risk assessment noted above, SCE performs detailed engineering reviews of specific locations within its Severe Risk Area to confirm appropriate mitigations to deploy.¹⁴

Given the multi-faceted nature of SCE's approach in using POI where it can be most informative and relevant to both near-term and long-term wildfire mitigation decisions, SCE's approach results in a comprehensive wildfire mitigation portfolio that balances costs against wildfire risk and mitigation benefits.

4. SCE IS COMPREHENSIVELY ADDRESSING SECONDARY CONDUCTOR IGNITIONS WITH AN APPROPRIATE SENSE OF URGENCY

Cal Advocates states that ignitions due to secondary conductor are "too high" and that "immediate, targeted, and comprehensive measures" are necessary. Cal Advocates argues that Energy Safety should require "substantial progress" from SCE in the 2025 WMP Update on predictive model development and preventative replacement plans, with subsequent reporting in the quarterly reports.¹⁵

SCE recognizes the importance of mitigating the risk of ignitions due to secondary conductor and is making substantial progress on this issue. As SCE stated in both its response to ACI SCE-22-17¹⁶ and in its reply to comments on its WMP,¹⁷ SCE has moved forward expeditiously to comprehensively address the increase in ignitions due to secondary conductors observed over 2019-2021. SCE's actions include adding new inspection criteria, additional training, asset and vegetation inspections, development and evaluation of coverings and breakaway devices, notifications to replace open-wire bare secondaries with multiplex conductor, and updating standards to include secondary bare wire replacement as part of the Wildfire Covered Conductor Program. SCE also continues its work on a predictive model for secondary conductor that it discussed in its WMP.¹⁸

These efforts are yielding results. As detailed in its response to ACI SCE-22-17, SCE has observed a decrease in ignitions related to its secondary system in HFRA from 15 in 2021 to 7 in 2022, an increase in notifications (meaning inspections are proactively identifying issues) from 4,502 in 2021 to 8,322 in 2022, and improved inspection QC pass rates (meaning inspectors are not missing issues) from 92% in 2021 to 94% in 2022.

Given SCE's substantial progress to date and existing commitments to mitigate this issue across multiple fronts in the near term, there is no basis for Cal Advocates' claims for additional requirements and reporting. Further, the quarterly reporting process is focused by statute on the

¹⁴ SCE's 2023-2025 WMP, Section 6.2.1.2, pages 114-116, [web link](#).

¹⁵ PAO Comments, pages 5-6.

¹⁶ SCE's 2023-2025 WMP, Appendix D, pages 764-766.

¹⁷ SCE's Reply to Comments Regarding SCE's 2023-2025 Wildfire Mitigation Plan, 6/6/23, page 4.

¹⁸ SCE's 2023-2025 WMP, Section 6.7.2.2, pages 177-178.

implementation status of an approved WMP and is not an appropriate venue for status updates of the kind suggested by Cal Advocates.¹⁹

5. SCE CONTINUES TO EVALUATE AND UPDATE ITS INSPECTION PRACTICES TO CONSIDER EMERGING MODES OF POTENTIAL COVERED CONDUCTOR FAILURE MODES

In ACI SCE-23-11,²⁰ the Draft Decision calls for SCE to discuss failure modes unique to covered conductor and to address how these failure modes are accounted for by SCE’s inspection practices. SCE must submit its response to this ACI in the 2025 WMP Update, which will be filed in the Q1, 2024 timeframe (pending the schedule and requirements to be issued by Energy Safety).

Cal Advocates states that, regarding covered conductor failure modes such as water-induced corrosion, the Draft Decision “leaves room for more immediate, actionable steps that SCE can undertake to mitigate existing risks.”²¹ Cal Advocates suggests that SCE should develop a detailed covered conductor inspection plan and provide it in the next quarterly report, and SCE should be required to engage an independent auditor to evaluate its inspection and maintenance protocols for covered conductor.²²

SCE is currently working on expanding its inspection surveys and practices to further identify covered conductor failure modes due to water intrusion, splice cover issues, surface damage, and other issues. Given that the ACI as currently drafted calls for a response by SCE in the 2025 WMP Update, which is approximately six months from now, and given SCE’s existing inspection processes and QA/QC efforts, SCE does not see a compelling reason provided by Cal Advocates to require a more immediate response or to engage an independent auditor. Energy Safety can evaluate SCE’s response to the ACI and determine if additional actions are supported based on the merits of the issue and SCE’s intended approach.

Finally, SCE reiterates the point it made above regarding Cal Advocates’ suggestions related to secondary conductors, that the quarterly reports are not an appropriate venue for status updates of this kind.

CONCLUSION

SCE appreciates the opportunity to reply to the comments on the Draft Decision. If you have questions, or require additional information, please contact me at connor.flanigan@sce.com.

Sincerely,

//s//

Connor J. Flanigan
Managing Director, State Regulatory Operations

¹⁹ Public Utilities Code Section 8389(e)(7).

²⁰ Draft Decision on SCE’s 2023-2025 WMP, page 90.

²¹ PAO Comments, page 7.

²² PAO Comments, page 7.