



Connor J. Flanigan
Managing Director, State Regulatory Operations
connor.flanigan@sce.com

Docket# 2023-2025-WMPs

November 1, 2023

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

SUBJECT: WMP 2024 Target Update

Dear Program Manager Morgans:

Pursuant to the 2023-2025 WMP Process and Evaluation Guidelines, SCE respectfully submits updates to its 2024 WMP program targets. The updates are provided in a redline format relative to how the targets were initially submitted in the 2023-2025 WMP. SCE has also provided explanations for each change. SCE does not have any changes to 2023 targets or to performance metric forecasts.

If you have questions or require additional information, please contact me at connor.flanigan@sce.com.

Sincerely,

//s//

Connor Flanigan
Managing Director, State Regulatory Operations

2024 TARGET UPDATES

Please refer to the subsequent tables for redlines that indicate changes relative to what was provided in the 2023-2025 WMP or in subsequent errata.

SH-1: Covered Conductor

SCE proposes adjusting the target from 1,050 to 950 and the strive target from 1,200 to 1,050. This proposed adjustment reflects constraints SCE expects to encounter and impacts to communities given a concentration of utility work in certain geographic areas. Any work that was originally scheduled for 2024 and not completed will be completed in 2025. See redlines on page 5.

SCE has updated the risk metrics in the target table to reflect the modified target.

SH-2: Undergrounding Overhead Conductor

SCE is not proposing a change to the target value but proposes that the statement “subject to permitting, land rights, and other third-party constraints” should apply to both the target and the strive target. This revised language, which is more narrow than the previous qualification of “subject to resource constraints and other execution risks” that was applied only to the strive target, is intended to more specifically identify potential issue over which SCE has limited control. See redlines on page 5.

SCE has not updated the risk metrics as this modification does not change SCE’s intended target.

SH-15: Vertical Switches

SCE proposes adjusting the target from “N/A - Sunsetting in 2023” to “Install any remaining units scoped in prior years.” SCE expects that a small number of switches may be left to be completed in 2024. SCE still intends to retire this program following execution of the 2024 target. See redlines on page 6.

SCE has not updated the risk metrics in the target table as the scope and calculated risk reduction for SH-15 has not changed (the difference is the timeframe over which the scope will be executed).

SH-17: Rapid Earth Fault Current Limiters (REFCL) (Ground Fault Neutralizer (GFN))

SCE proposes adjusting the target of “completing” GFN construction at Banducci substation to “initiate” construction at Banducci. SCE experienced engineering delays and lengthy material procurement lead times that has impacted the ability to complete REFCL construction at Banducci in 2024. See redlines on page 7.

SCE has updated the risk metrics in the target table to state “N/A” as the work is no longer forecasted to be complete in 2024, hence the calculated risk reduction will not take place in 2024.

IN-9a: Transmission Conductor & Splice Assessment: Spans with LineVue

SCE proposes adjusting the target from “Target to be developed based on an engineering analysis to be performed in 2023” to 25 and setting a strive target of 50. This proposed target balances the decision to continue this work while providing SCE with increased operational bandwidth for related and potentially more promising efforts (see IN-9b below). SCE will continue to evaluate this program based on 2023 and 2024 results. See redlines on page 10.

SCE has updated the risk metrics in the target table to reflect the modified target.

IN-9b: Transmission Conductor & Splice Assessment: Splices with X-Ray

SCE proposes adjusting the target from “Target to be developed based on an engineering analysis to be performed in 2023” to 50 and setting a strive target of 100. This proposed target reflects the high find rate of this program and SCE’s intention to expand efforts while still considering operational constraints as well as the potential for additional expansion or a proactive approach to splices in future years. See redlines on page 10.

SCE has updated the risk metrics in the target table to reflect the modified target.

VM-1: Hazard Tree Management Program (HTMP)

SCE proposes adjusting the target from 408 to 470. This change is based on refreshed risk data, which increased the number of grids/circuits in the “A” category of SCE’s Tree Risk Index (TRI), which are inspected annually.¹ See redlines on page 12.

SCE has updated the risk metrics in the target table to reflect the modified target.

VM-4: Dead & Dying Tree Removal

SCE proposes adjusting the target from 485 to 620 for the same reason as described in VM-1 above. See redlines on page 12.

SCE has updated the risk metrics in the target table to reflect the modified target.

DEP-5: Aerial Suppression

SCE plans to continue this program and has adjusted the 2024 target language to state that SCE will “provide fire agencies with funding to support quick reaction force (QRF) program.” This replaces the previous language that SCE would “continue to reassess availability and funding for aerial suppression resources in SCE’s service area annually” as SCE has determined that it is prudent and reasonable to continue to fund the QRF program in 2024 due to its effectiveness in 2023 and lack of alternative funding. See redlines on page 15.

The risk metrics for 2024 assumed the program would continue, and hence no adjustment is needed.



¹ Please see pages 395-396 of SCE’s 2023-2025 WMP for further explanation of SCE’s approach to HTMP inspection frequency.

DEP-1: Wildfire Safety Community Meetings

SCE proposes a target of at least two wildfire community safety meetings in targeted HFRA communities based on the impact of 2023 year-end PSPS performance and ongoing wildfire mitigation activities. SCE observed a decline of 42% in attendance in meetings from 2022 to 2023, potentially due to downward trends of PSPS de-energizations in recent years, hence the reduction relative to the 2023 target of four meetings. SCE can host additional meetings if the need arises. See redlines on page 17.

This program did not have risk metrics in the target table and hence no adjustment is needed.

WMP SECTION 8.1.1.2 - SYSTEM HARDENING AND INSPECTIONS

WMP Table 8-3 - Grid Design, Operations, and Maintenance Targets by Year

Initiative Activity	Tracking ID	2024 Target & Unit	x% Risk Impact 2024 (Unit/HFRA)	% in SRA/HCA 2024
Covered Conductor	SH-1	Install 1,050 950 circuit miles of covered conductor in SCE’s HFRA SCE will strive to install up to as many as 1,200 1,050 circuit miles of covered conductor in SCE’s HFRA, subject to resource constraints and other execution risks	53%/6% 55%/5%	91% 92%
Undergrounding Overhead Conductor	SH-2	Convert 16 circuit miles of overhead to underground in SCE's HFRA, subject to permitting, land rights, and other third-party constraints SCE will strive to convert up to 20 miles of overhead to underground in SCE's HFRA, subject to resource constraints and other execution risks risks permitting, land rights, and other third-party constraints	98%/.64%	100%
Branch Line Protection strategy	SH-4	N/A – Sunsetting in 2023, further fuse replacements will be completed via opportunity work	N/A	N/A
Remote Controlled Automatic Reclosers Settings Update	SH-5	SCE will install 5 RAR/RCS sectionalizing devices subject to 2023 PSPS analysis and subject to change SCE will strive to install 17 RAR/RCS sectionalizing devices subject to 2023 PSPS analysis, resource constraints and other execution risks	34%/.24%	67%

Circuit Breaker Relay Hardware for Fast Curve	SH-6	Replace/ upgrade remaining 10 CB relay units with fast curve settings in SCE's HFRA, subject to resource constraints and other execution risks	32%/.004%	92%
Transmission Open Phase Detection	SH-8	Retrofit TOPD at 5 locations with trip capabilities where alarm mode was previously deployed and that serve HFRA circuitry	1%/.01%	100%
Tree Attachments Remediation	SH-10	Remediate 500 tree attachments in SCE's HFRA SCE will strive to complete up to 600 tree attachment remediations in SCE's HFRA, subject to resource constraints and other execution risks	21%/.03%	42%
Long Span Initiative (LSI)	SH-14	Remediate 1,000 spans in SCE's HFRA SCE will strive to remediate up to 1,200 spans in SCE's HFRA, subject to resource constraints and other execution risks	5%/.04%	82%
Vertical Switches	SH-15	N/A — Sunsetting in 2023 Install any remaining units scoped in prior years	N/A ²	N/A ³
Vibration Damper Retrofit	SH-16	Retrofit vibration dampers on 500 structures where covered conductor is already installed in SCE's HFRA SCE will strive to retrofit vibration dampers on up to 600 structures where covered conductor is already installed in SCE's HFRA, subject to resource constraints and other execution risks	11%/.01%	99%

² Please see SCE's explanation on page 2.

³ Please see SCE's explanation on page 2.

Rapid Earth Fault Current Limiters (REFCL) (Ground Fault Neutralizer (GFN))	SH-17	SCE will complete initiate construction of GFN at one substation (Banducci)	45%/.54% N/A / N/A	88% N/A
Rapid Earth Fault Current Limiters (REFCL) - Grounding Conversion	SH-18	SCE will target four locations for grounding conversion, subject to land availability SCE will strive to target up to 6 locations for grounding conversion, subject to land availability	N/A scope not determined yet	N/A scope not determined yet

WMP Table 8-4 - Asset Inspections Targets by Year

Initiative Activity	Tracking ID	Target End of Q2 2024	Target End of Q3 2024	End of Year Target 2024 & Unit	x% Risk Impact 2024	% in SRA/HCA 2024
Distribution High Fire Risk- Informed (HFRI) Inspections and Remediations (Ground and Aerial)	IN-1.1	101,320	172,640	Inspect 187,000 structures in HFRA SCE will strive to inspect up to 217,000 structures in HFRA This target includes HFRI inspections, compliance due structures in HFRA, and emergent risks identified during the fire season (e.g., AOCs)	90%	94%
Transmission High Fire Risk- Informed (HFRI) Inspections and Remediations (Ground and Aerial)	IN-1.2	14,400	25,800	Inspect 28,000 structures in HFRA SCE will strive to inspect up to 29,500 structures in HFRA This target includes HFRI inspections, compliance due structures in HFRA and emergent risks identified during the fire season (e.g., AOC)	88% (Ground) 88% (Aerial)	86%
Infrared Inspection of Energized Overhead Distribution Facilities and Equipment	IN-3	2,295	5,300	Inspect 5,300 distribution overhead circuit miles in HFRA	63%	77%

Initiative Activity	Tracking ID	Target End of Q2 2024	Target End of Q3 2024	End of Year Target 2024 & Unit	x% Risk Impact 2024	% in SRA/HCA 2024
Infrared Inspection, Corona Scanning, and High-Definition Imagery of Energized Overhead Transmission Facilities and Equipment	IN-4	600	900	Inspect 1,000 transmission overhead circuit miles in HFRA	50%	80%
Generation High Fire Risk-Informed Inspections and Remediation	IN-5	52	160	Inspect 160 generation related assets in HFRA SCE will strive to inspect 190 generation-related assets in HFRA, subject to resource constraints and other execution risks	29%	N/A
Inspection and Maintenance Tools	IN-8	Conduct requirements gathering for incorporating distribution ground and InspectCam capabilities in	Initiate solution analysis for incorporating distribution ground and InspectCam capabilities in	Execute the approved designs/recommendations for incorporating distribution ground and InspectCam capabilities into a single digital platform	N/A	N/A

Initiative Activity	Tracking ID	Target End of Q2 2024	Target End of Q3 2024	End of Year Target 2024 & Unit	x% Risk Impact 2024	% in SRA/HCA 2024
		single digital platform	single digital platform			
Transmission Conductor & Splice Assessment: Spans with LineVue	IN-9a	N/A 20	N/A 25	Target to be developed based on an engineering analysis to be performed in 2023 Will inspect 25 spans with Line Vue SCE will strive to inspect up to 50 spans with Line Vue, subject to resource constraints and other execution risks	N/A 0.003%	N/A 100%
Transmission Conductor & Splice Assessment: Splices with X-Ray	IN-9b	N/A 35	N/A 50	Target to be developed based on an engineering analysis to be performed in 2023 Will inspect 50 splices with X-Ray SCE will strive to inspect up to 100 splices with X-Ray, subject to resource constraints and other execution risks	N/A 0.00001 %	N/A 100%
Wildfire Safety Data Mart and Data Management (WiSDM / Ezy)	DG-1	N/A	N/A	N/A – Sunsetting in 2023	N/A	N/A

WMP SECTION 8.2.1.2 - VEGETATION MANAGEMENT

WMP Table 8-14 - Vegetation Management Initiative Targets by Year

Initiative Activity	Tracking ID	2024 Target & Unit	x% Risk Impact 2024	% in SRA/HCA 2024
Expanded Clearances for Generation Legacy Facilities	VM-3	Perform vegetation treatment and maintenance to 50 sites SCE will strive to perform vegetation treatment and maintenance to 60 sites	23%	N/A
Vegetation Management Work Management Tool (Arbora)	VM-6	Monitor stabilization of Arbora and develop plan and begin execution of plan to enable additional VM maintenance programs	N/A	N/A

WMP Table 8-15 - Vegetation Inspections Targets

Initiative Activity	Tracking ID	Target End of Q2 2024 & Unit	Target End of Q3 2024 & Unit	End of Year Target 2024 & Unit	x% Risk Impact 2024	% in SRA/HCA 2024
Hazard Tree Management Program (HTMP)	VM-1	250 252	358 383	Inspect 408 470 grids/circuits and prescribe mitigation for hazardous trees with strike potential within those grids in SCE’s HFRA* *To inform trimming prescriptions in the January to December calendar year, with inspections occurring as early as November 1 in the prior year.	70% 84%	88% 80%
Structure Brushing	VM-2	29,870	63,700	Inspect and clear (where clearance is needed) 63,700 structures,* with the exception of structures for which there are customer access or environmental constraints SCE will strive to inspect and clear (where clearance is needed) 135,200 structures,* with the exception of structures for which there are customer access or environmental constraints *These structures are in addition to poles subject to PRC 4292	62%	84%
Dead & Dying Tree Removal	VM-4	281 326	424 510	Inspect 485 620 grids/circuits and prescribe mitigation for dead and dying trees with strike potential within those grids/circuits*	100%	85% 78%

Initiative Activity	Tracking ID	Target End of Q2 2024 & Unit	Target End of Q3 2024 & Unit	End of Year Target 2024 & Unit	x% Risk Impact 2024	% in SRA/HCA 2024
				*To inform trimming prescriptions in the January to December calendar year, with inspections occurring as early as November 1 in the prior year.		
Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Distribution Lines in HFRA	VM-7	308	539	Inspect 770 grids within our distribution system* *To inform trimming prescriptions in the January to December calendar year, with inspections occurring as early as November 1 in the prior year.	100%	75%
Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Transmission Lines in HFRA	VM-8	273	378	Inspect 416 circuits within our transmission system* *To inform trimming prescriptions in the January to December calendar year, with inspections occurring as early as November 1 in the prior year.	100%	75%
LiDAR Distribution Vegetation Inspections	VM-9	650	1,020	Inspect at least 1,020 HFRA circuit miles *Subject to change based on technology, program adjustments, and grid/circuits layout	N/A	N/A
LiDAR Transmission Vegetation Inspections	VM-10	973	1,335	Inspect at least 1,500 HFRA circuit miles *Subject to change based on program adjustments and evolution of remote sensing technologies	N/A	N/A

WMP SECTION 8.3.1.2 - SITUATIONAL AWARENESS

WMP Table 8-23 - Situational Awareness Initiative Targets by Year

Initiative Activity	Tracking ID	2024 Target & Unit	x% Risk Impact 2024 (Scoped/HFRA)
Weather Stations	SA-1	Install 50 weather stations in SCE's HFRA SCE will strive to install up to 55 weather stations in SCE's HFRA, subject to resource and execution constraints	32%/.001% (PSPS risk only)
Weather and Fuels Modeling	SA-3	Equip 200 weather station locations with machine-learning capabilities SCE will strive to equip up to 300 weather station locations with machine learning capabilities, subject to resource and execution constraints	3%/.03% (PSPS risk only)
Fire Spread Modeling	SA-8	Provide vendor with analytics report and work with the vendor to complete a plan on future improvements	2%/.02%
High Definition (HD) Cameras	SA-10	Install 10 HD Cameras SCE will strive to install up to 20 HD Cameras, subject to resource and execution constraints	4.60%/.01%
Early Fault Detection	SA-11	Install Early Fault Detection (EFD) at 50 locations SCE will strive to install EFD at up to 100 locations, subject to resource constraints and other execution risks	6%/.08%

WMP SECTION 8.4.1.2 - EMERGENCY PREPAREDNESS

WMP Table 8-35 - Emergency Preparedness Initiative Targets by Year

Initiative Activity	Tracking ID	2024 Target & Unit	x% Risk Impact 2024 (Scoped/HFRA)
SCE Emergency Response Training	DEP-2	PSPS response teams are fully qualified/re-qualified by 7/1 annually to maintain readiness	N/A
Aerial Suppression	DEP-5	<p>SCE will continue to reassess availability and funding for aerial suppression resources in SCE's service area annually to determine ongoing QRF strategy</p> <p>Provide fire agencies with funding to support quick reaction force (QRF) program for 2024</p> <p>No Strive Target</p>	1.9%
Customer Care Programs (Critical Care Backup Battery (CCBB) Program)	PSPS-2	<p>Complete 85% of battery deliveries to eligible customers within 30 calendar days* of program enrollment, subject to customer availability, reschedule requests and battery supply constraints</p> <p>Strive to complete 90% of battery deliveries to eligible customers within 45 calendar days of program enrollment, subject to customer availability, reschedule requests and battery supply constraints</p> <p>* Number of calendar/business days subject to change based on customer survey feedback to inform appropriate calendar/business day measurement</p>	31%/.007% (PSPS risk only)

Initiative Activity	Tracking ID	2024 Target & Unit	x% Risk Impact 2024 (Scoped/HFRA)
Customer Care Programs (Portable Power Station and Generator Rebates)	PSPS-3	<p>Process 85% of all rebate claims within 30 business days* of receipt from website vendor; excluding website related delays and subject to receiving all required customer information</p> <p>Strive to process 90% of all rebate claims within 45 business days of receipt from website vendor; excluding website related delays and subject to receiving all required customer information</p> <p>* Number of calendar/business days subject to change based on customer survey feedback to inform appropriate calendar/business day measurement</p>	0.11%/.0002% (PSPS risk only)

WMP 8.5.1.2 - COMMUNITY OUTREACH

WMP Table 8-55 - Community Outreach and Engagement Initiative Targets by Year

Initiative Activity	Tracking ID	2024 Target & Unit	x% Risk Impact 2024
Wildfire Safety Community Meetings	DEP-1	<p>Continue or revise — determined based on the outcome of 2023</p> <p>SCE will host at least two wildfire community safety meetings in targeted HFRA communities based on the impact of 2023 year-end PSPS performance and ongoing wildfire mitigation activities</p>	N/A
Customer Research and Education	DEP-4	SCE plans to conduct at least three PSPS-related customer studies in 2024	N/A

WMP Table 8-56 - Community Outreach and Engagement Initiative Targets by Quarter

Initiative Activity	Tracking ID	Target End of Q2 2024 & Unit	Target End of Q3 2024 & Unit	2024 Target & Unit	x% Risk Impact 2024
Wildfire Safety Community Meetings	DEP-1	TBD 2	TBD 2	Continue or revise — determined based on the outcome of 2023 SCE will host at least two wildfire community safety meetings in targeted HFRA communities based on the impact of 2023 year-end PSPS performance and ongoing wildfire mitigation activities	N/A
Customer Research and Education	DEP-4	1	2	SCE plans to conduct at least three PSPS-related customer studies in 2024	N/A

WMP SECTION 9.1.4 - PSPS

WMP Table 9-5 - PSPS Targets

Initiative Activity	Tracking ID	2024 Target & Unit	x% Risk Impact 2024
Covered Conductor	SH-1	Install 1,050 950 circuit miles of covered conductor in SCE's HFRA SCE will strive to install up to as many as 1,200 1,050 circuit miles of covered conductor in SCE's HFRA, subject to resource constraints and other execution	See risk impact in WMP Table 8-3
Remote Controlled Automatic Reclosers Setting Update	SH-5	SCE will install 5 RAR/RCS sectionalizing devices subject to 2023 PSPS analysis and subject to change SCE will strive to install 17 RAR/RCS sectionalizing devices subject to 2023 PSPS analysis, resource constraints and other execution risks	See risk impact in Table 8-3
Weather Stations	SA-1	Install 50 weather stations in SCE's HFRA SCE will strive to install up to 55 weather stations in SCE's HFRA, subject to resource and execution constraints	See risk impact in Table 8-23
Weather & Fuels Modeling	SA-3	Equip 200 weather station locations with machine learning capabilities	See risk impact in Table 8-23

		SCE will strive to equip up to 300 weather station locations with machine learning capabilities, subject to resource and execution constraints	
Fire Spread Modeling	SA-8	Provide vendor with analytics report and work with the vendor to complete a plan on future improvements	See risk impact in Table 8-23
High Definition (HD) Cameras	SA-10	Install 10 HD Cameras SCE will strive to install up to 20 HD Cameras, subject to resource and execution constraints	See risk impact in Table 8-23
PSPS	PSPS.NonInitiative.01	Because exact locations of mitigations impacting PSPS have not been finalized for 2024, SCE targets a reduction of 14.9M minutes of customer interruption assuming the same reduction as 2023; SCE may update this value in the future to reflect actual mitigation scope. While predicting the exogenous factors that drive future PSPS impacts is not reasonably possible, SCE will strive to keep 2024 PSPS impacts of 135.7M customer minutes of interruption.	N/A