

*Southern California Edison*  
*Wildfire NDDR – Wildfire NDDR*

**DATA REQUEST SET E n e r g y S a f e t y - D R - E U P - 2 4 - 0 1**

**To: Energy Safety**  
**Prepared by: Kyle Ferree**  
**Job Title: Senior Advisor**  
**Received Date: 1/30/2024**

**Response Date: 2/13/2024**

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**Question 01:**

- How do you define an undergrounding project?
- What are the specific phases of an undergrounding project that you track? Are they aligned with the five phases listed in the CPUC SB 884 staff proposal (Scoping, Designing/Estimating, Permitting/Dependency, Ready for Construction, and Construction)?
- At what phase are you able to make comparisons with other mitigation types? How do you determine which alternative mitigations to include in the comparison?
- At what phase can you develop firm cost estimates?
- At what phase do you consider the project to be a scoped undergrounding project?
- At what phase are project ID numbers assigned? At what phase are sub-project/job ID numbers assigned?
- At what phase are precise GIS data available for the undergrounded line? What types of organizations/community partners is this information shared with and when?

**Response to Question 01:**

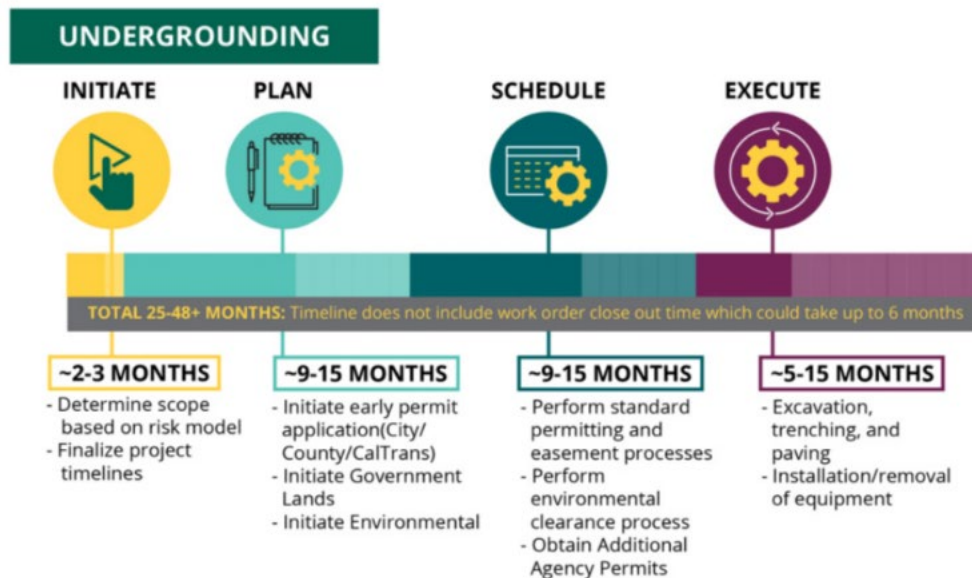
- How do you define an undergrounding project?

**SCE Response:** SCE underground projects are made up of multiple segments on one circuit. SCE typically tracks undergrounding projects by the underground miles installed, but also tracks the overhead miles replaced.

- What are the specific phases of an undergrounding project that you track? Are they aligned with the five phases listed in the CPUC SB 884 staff proposal (Scoping, Designing/Estimating, Permitting/Dependency, Ready for Construction, and Construction)?

**SCE Response:** Please see the below figure for the phases associated with undergrounding projects.

## Timeline of Undergrounding Work



- At what phase are you able to make comparisons with other mitigation types? How do you determine which alternative mitigations to include in the comparison?

**SCE Response:** SCE's mitigation comparisons are done more so at the Integrated Wildfire Mitigation Strategy portfolio level. SCE analyzes circuits and HFRA areas to determine which are Severe Risk Area (SRA) and deserving of the most intensive and effective mitigation. After SRA and targeted undergrounding (TUG) selection, projects go through SCE's review and revise process where subject matter experts validate TUG necessity, and through a feasibility analysis to ensure TUG is realistically achievable. During a project's plan phase, TUG feasibility is also re-evaluated.

- At what phase can you develop firm cost estimates?

**SCE Response:** SCE has engineering analysis to develop cost estimates during the Initiate Phase in the above figure.

- At what phase do you consider the project to be a scoped undergrounding project?

**SCE Response:** A project is considered scoped when it receives a Project Initiation Form (PIF) in the Initiate Phase of the above figure.

- At what phase are project ID numbers assigned? At what phase are sub-project/job ID numbers assigned?

**SCE Response:** ID numbers are also assigned during the PIF process.

- At what phase are precise GIS data available for the undergrounded line? What types

of organizations/community partners is this information shared with and when?

**SCE Response:** Precise GIS data is available upon the completion of a project and its mapping in SCE's system of record. SCE shares this precise data with intervenors and regulators through various regulatory proceedings, as requested.

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**Question 02:**

- How many undergrounding projects do you currently have in each of the project phases described in Q01?
- How many project miles fall under each category?
- Are some projects comprised of multiple circuit segments or all they all individual segments? If projects are comprised of multiple segments, must those segments be continuous?

**Response to Question 02:**

- How many undergrounding projects do you currently have in each of the project phases described in Q01?

**SCE Response:**

SCE defines “projects” as scoped undergrounding projects with PIF (Project Information Form) numbers. Note that once SCE has created a PIF, the project has completed the Initiate phase.

During the design process, SCE breaks apart a PIF into multiple work orders. Therefore, one project can have work orders in various stages within the Plan, Schedule, and Execute phases. For the purpose of this response, if a PIF is under multiple categories, SCE will count the project under all associated categories (e.g., if a PIF has work orders under the Plan and Execute phase the project will be counted under Plan and Execute).

Please see the table below

Phase	Number of Projects
Initiate	0
Plan	76
Schedule	14
Execute	4

- How many project miles fall under each category?

**SCE Response:**

Phase	Number of Miles
Initiate	0
Plan	275
Schedule	51
Execute	2

- Are some projects comprised of multiple circuit segments or all they all individual segments? If projects are comprised of multiple segments, must those segments be continuous?

**SCE Response:** Virtually all SCE undergrounding projects are comprised of multiple circuit segments. Although segments are typically continuous, they are not required to be.

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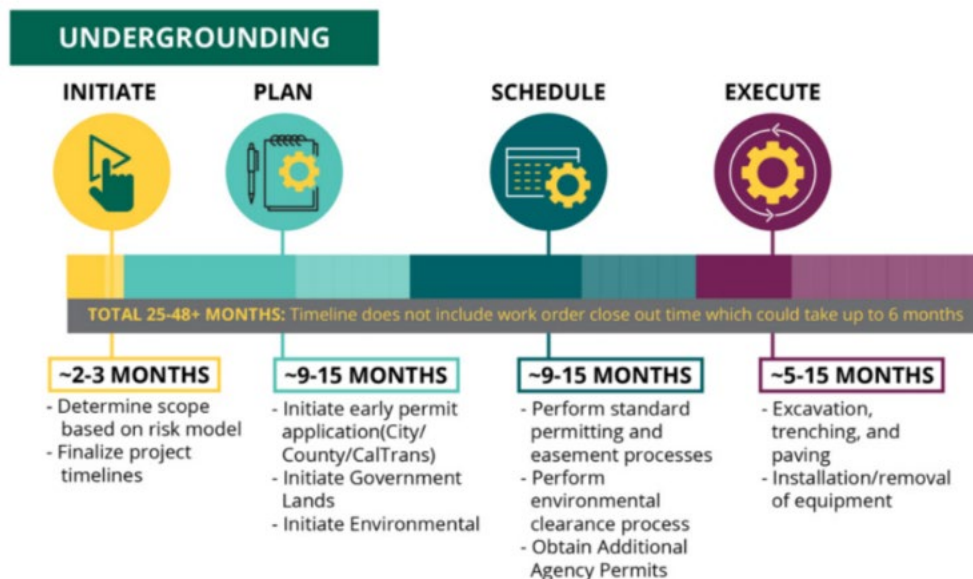
**Question 03:**

- Please provide an estimate of the time needed to complete an undergrounding project and approximate time needed for each phase of the project.

**Response to Question 03:**

Please see the figure below, which was also provided in response to Energy Safety-DR-EUP-24-01 question 1. It should be noted that the time ranges provided for each phase in the figure below are general rules of thumb. Undergrounding projects may be completed more quickly or take longer to complete.

***Timeline of Undergrounding Work***



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**Question 04:**

- How do you define a wildfire rebuild area?
- What is your process for determining when to underground lines in these areas?

**Response to Question 04:**

- How do you define a wildfire rebuild area?

**SCE Response:** SCE does not define such a term. Please see below for SCE’s standard process for storm and fire restoration.

- What is your process for determining when to underground lines in these areas?

**SCE Response:** SCE’s standard process for storm or fire restoration is to rebuild “like-for-like” according to current SCE design standards. For example, what was previously bare overhead wire would be rebuilt with overhead covered conductor, as that is SCE’s new construction standard. In rarer cases where tree attachment circuits were being rebuilt, SCE would replace tree attachments with utility poles and overhead covered conductor.

The reason that SCE generally does not rebuild overhead lines as underground lines is because of the longer lead times to design, permit, and construct something entirely different from what was previously there. Generally, those facilities serve existing load which requires restoration of service as soon as possible.