

***Southern California Edison***  
***2023-WMPs – 2023-WMPs***

**DATA REQUEST SET T U R N - S C E - 0 0 1**

**To: TURN**  
**Prepared by: Tram Camba**  
**Job Title: Wildfire Safety – Sr Advisor**  
**Received Date: 4/25/2023**

**Response Date: 4/28/2023**

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**Question 01 :**

Please provide in table form the following information, on an annual basis for 2019-2022 (actual) and 2023-2024 (forecast):

- a. Number of circuit miles of covered conductor installation in the Wildfire Covered Conductor Program (WCCP),
- b. Expenditures (broken out by capital and expense) for the WCCP, and
- c. Comparison of the figures in “a” and “b” above to the CPUC authorized levels in the 2021 GRC proceeding (A.19-08-013).

**Response to Question 01 :**

SCE objects to subpart (c) of this data request because it is outside of the scope of this WMP, which is not a cost reasonableness review or cost recovery proceeding. Moreover, the California Public Utilities Commission (CPUC) – not the Office of Energy Infrastructure Safety – set the authorized soft cap amount for WCCP for 2019-2023 and will evaluate the reasonableness of any costs above that authorized soft cap amount. Finally, the “2021 GRC proceeding” Track 1 did not set an authorized amount of capital expenditures for WCCP in 2024; that issue is being litigated in Track 4 of A.19-08-013, in which TURN is an active participant. Subpart c is not reasonably germane to the issues being examined in this proceeding and therefore unlikely to lead to the discovery of relevant evidence.

Subject to and without waiving the foregoing objections, SCE responds as follows:

- (a) The recorded and forecast annual number of circuit miles<sup>1</sup> of covered conductor installation in the Wildfire Covered Conductor Program (WCCP) is shown in the table below.

	Recorded				Forecast	
	2019	2020	2021	2022	2023	2024
Circuit Miles (WCCP)	277	797	1426	1356	1200	1200

- (b) The recorded and forecast annual capital<sup>2</sup> and expense<sup>3</sup> for the covered conductor

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<sup>1</sup> The recorded circuit miles reflect the amount provided in the application filed for 2021 GRC Track 3 and Track

4.

<sup>2</sup> The capital expenditure provided in the table are based on 2023 to 2025 WMP submission.

<sup>3</sup> The O&M expense is associated with the following sub-activities: WCCP Construction Standards Remediation and Field & Process Validation.

installation in the Wildfire Covered Conductor Program (WCCP) is shown in the table below.

	Recorded				Forecast	
	2019	2020	2021	2022	2023	2024
Capital Expenditures (Nominal \$000s)	\$ 239,911	\$ 546,151	\$ 897,600	\$ 791,274	\$ 897,169	\$ 843,319
O&M Expenses (Nominal \$000s)	\$ -	\$ 554	\$ 545	\$ 1,411	\$ 857	\$ 873

(c) The premise of TURN's question is flawed because it implicitly assumes the 2021 Track 1 Decision set a year-by-year "authorized amount" for WCCP for 2019-2023. It did not. Instead, it set a cumulative and preliminary 2019-2023 capital expenditure authorized amount of \$2,404 million,<sup>4</sup> and explicitly held that SCE was authorized to seek reasonableness review and cost recovery for any expenditures over that amount.<sup>5</sup> As mentioned above, authorized WCCP expenditures for 2024 were not addressed in the Track 1 Decision.

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<sup>4</sup> The authorized tree attachment remediation amount is not included in this value.

<sup>5</sup> D.21-08-036, p. 200, "In consideration of this statutory obligation, as well as the significant threats that wildfires pose to the state of California, and to SCE customers in particular, we authorize funding sufficient to support the deployment of 4,500 circuit miles of covered conductor. In addition, SCE is provided the opportunity to deploy additional covered conductor circuit miles above the level approved in this decision subject to after-the-fact reasonableness review."