

Southern California Edison
2022-WMPs – 2022 Wildfire Mitigation Plan Updates

DATA REQUEST SET O E I S - S C E - 2 2 - 0 0 7

To: Energy SafetyTo: Energy Safety

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Received Date: 4/12/2022

Response Date: 4/15/2022

Question 07:

Maturity Survey- Vegetation Management

a. SCE's response to the following maturity survey questions regressed from 2021 to 2022. In 2021, SCE had responded "Yes" to all these questions, but for 2022, changed its responses to "No."

Explain why the responses to these questions changed from Yes to No.

i. Capability 24: Vegetation Grow-in Mitigation

1. E.IV.h Does the utility work with local landowners to provide a cost-effective use for cutting vegetation?

ii. Capability 25: Vegetation Fall-in Mitigation

1. E.V.f Does the utility work with local landowners to provide a cost-effective use for cutting vegetation?

2. E.V.g Does the utility work with partners to identify new cost-effective uses for vegetation, taking into consideration environmental impacts and emissions of vegetation waste?

Response to Question 07:

SCE modified its responses from "Yes" in 2021 to "No" in 2022 for the Maturity Survey questions 24.E.IV.h and 25.E.V.f, identified above, because SCE modified its interpretation of the questions, specifically with regard to the term "cost effective." SCE works with local landowners and partners to determine uses for cut vegetation. SCE also has standard processes to remove vegetation from the site and accommodates customer requests, such as cutting vegetation into firewood. These costs are included in the contractor's rates; there are not additional considerations concerning cost effectiveness.¹ Because it is unclear what constitutes "cost effective" for these questions, SCE provided conservative responses by selecting "No."

SCE changed its response from "Yes" in 2021 to "No" in 2022 for the Maturity Survey question 25.E.V.g. because SCE believes the question is vague and ambiguous. SCE took a conservative approach in its response so as to not affirm that SCE is undertaking efforts that the question does not clearly describe. However, SCE does work with partners to implement various uses of green waste disposal. For example, in relation to the 2020 Creek Fire, SCE leveraged a "curtain burner" to dispose of green waste in a manner that controls for air pollution and can be more cost effective than hauling waste.

As indicated in SCE's response to OEIS in Question 1 of Data Request Set OEIS-SCE-22-001,

¹ SCE interpreted "cutting vegetation" to mean vegetation debris from pruning activities.

submitted on March 8, 2022, if the Maturity Model Survey questions identified above removed the term “cost-effective,” SCE would respond “Yes” to the questions.