

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

**DATA REQUEST SET OEIS - P - WMP \_ 2023 - SCE - 011**

**To: Energy Safety**  
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**Job Title: Senior Manager**  
**Received Date: 11/20/2023**

**Response Date: 12/6/2023**

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**Question 01:**

a) On November 1, 2023, SCE submitted a Change Order Request<sup>1</sup> to its approved 2023-2025 WMP. For each Change Order Request item listed on pages 2-3 of the Change Order Request under the heading “2024 Target Updates,” specify which Change Order Request criteria is being met in accordance with the 2023-2025 WMP Process and Evaluation Guidelines,<sup>2</sup> sections 12.2 and 12.3:

A. Type of initiative and change in risk (Section 12.2)

B. Updates to the electrical corporation’s 2024 quarterly initiative targets (Section 12.3)

C. Updates to projections for any performance metrics defined by Energy Safety and newly required or amended in 2023 (Section 12.3)

b) If the Change Order item meets criteria A, above, (Section 12.2), indicate the “type of initiative” (as listed in Section 12.2) and how the change results in either or both of the following:

1. An increase or decrease of more than 25 percent of an initiative’s risk reduction value based on an updated understanding of risk.

2. The change represents a significant shift in either the strategic direction or purpose of an initiative (e.g., introducing a novel risk model that may alter the risk profile of the electrical corporation’s circuits).

**Response to Question 01:**

SCE submitted the 2023-2025 WMP with the understanding that, given the time frame between submission of the WMP in February 2023 and the start of 2024, there would be an opportunity for reasonable refinement of 2024 targets later in 2023 to reflect updated information and results from SCE’s annual operational planning processes. This is especially important given the compliance nature of the WMP targets, in which SCE’s record in meeting targets informs overall WMP compliance. SCE provided such comments on the draft guidelines, and understood the changes in Section 12.3 of the final guidelines as intended to address this issue, thus allowing SCE and other utilities to provide targets with sufficient confidence.

Notwithstanding that concern, SCE has responded below based on the additional guidance received from OEIS on November 30, 2023. This additional guidance indicated that in some cases, SCE’s target changes as submitted on November 1, 2023 do not fit within the criteria as explained by OEIS. In those cases, SCE has provided an “N/A” in the response.

The responses below are organized relative to question parts “a” (i.e. change order criteria A, B, or C) and “b” (sub-criteria if A was chosen).

SH-1: Covered Conductor

a) N/A

b) N/A

SH-2: Undergrounding Overhead Conductor

a) N/A

b) N/A

SH-15: Vertical Switches

a) N/A

b) N/A

SH-17: REFCL GFN

a) A

b) 1\*

\*This target was initially based on completing the mitigation at the Banducci substation in 2024. However, SCE will not be able to complete the work in 2024, and hence the risk reduction that SCE anticipated to achieve in the covered circuits will drop from 45% to 0%. As SCE stated in its November 1 submission, SCE still intends to move forward with this mitigation despite the delay.

IN-9a & IN-9b: Transmission Splice

a) A

b) 1\*

\*These targets were initially undefined and dependent on an engineering analysis. SCE has since concluded that analysis and defined the scope, hence the risk reduction for this activity in 2024 increased from zero for each of the splices inspected.

VM-1: HTMP

a) N/A

b) N/A

VM-4: Dead & Dying Tree Removal

a) N/A

b) N/A

DEP-5: Aerial Suppression

a) N/A

b) N/A

DEP-1: Community Meetings

a) N/A

b) N/A