

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET SPD - SCE - WMP 2026-005

To: SPD

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Question 01.a-c:

In SCE's response to Question 1 of SPD-SCE-WMP2026-003, it provided a narrative response that explained the Targeted Underground (TUG) Scope for the Burn Scar has not been matched to the equivalent overhead conductor at the level of detail where each portion of undergrounding can be associated to a current existing Isolatable Circuit Segment. In its August 18 2025 Opening Comments on the SCE GRC (A.23-05-010), SCE stated that "SCE's rebuilding plan includes undergrounding 82 overhead distribution miles in HFTD (81 miles in Malibu and 1 mile in Altadena) that were already part of SCE's TUG forecast in this GRC. Notably, 81 of those 82 miles fall outside of the 212 underground miles resulting from TURN's 50% risk threshold adopted by the PD for TUG."¹

a. If SCE's TUG Scope for the Burn Scar has not been matched to equivalent overhead conductor, explain how SCE was able to determine that the 81 miles referenced above fall outside of the 212 underground miles resulting from TURN's 50% threshold.

i. Provide a workpaper at the granularity available to SCE that demonstrates the 81 miles in the Burn Scar referenced in SCE's Opening Comments fall outside of the 212 underground miles described in the Proposed Decision.

b. Drawing on Confidential_TURN-SCE-039_Q6.xlsx, provide a list of the circuit segment IDs that are included within the 82 miles that are scoped for TUG in the Burn Scar. SCE shall provide the Circuit Segment ID and the Anonymized Circuit Segment ID.

c. Drawing on Confidential_SPD-SCE-WMP2026-002 Q7.xlsx, provide a list of the circuit segment IDs that are included within the 82 miles that are scoped for TUG in the Burn Scar. SCE shall provide the Circuit Segment ID and the Anonymized Circuit Segment ID.

¹ SCE Opening Comments on Proposed Decision of SCE GRC (A23-05-010) at 10

Response to Question 01.a-c:

- a. SCE stated in response to question 1 of SPD-SCE-WMP2026-003, "The Targeted Underground (TUG) Scope has not been matched to the equivalent overhead conductor at the level of detail where each portion of undergrounding can be associated to a current existing Isolatable Circuit Segment ID." That required a new analysis that SCE had not

performed at that time. However, by using GIS and examining historical isolatable segment locations, SCE has since been able to associate approximately 110 out of the 152 miles of the current undergrounding scope for the January fire rebuild effort to the pre-existing isolatable circuit segments in SCE's total grid hardening scope of 1,830 miles submitted as part of the 2025 GRC. After further review of the data in response to this data request, SCE clarifies that:

- (1) There are a total of 152 rebuild undergrounding miles currently identified¹ as projects for completion in and adjacent to the Palisades and Eaton burn scars.
- (2) Of those 152 miles, at least 110 miles (on a cumulative isolatable circuit segment basis) were included in SCE's total grid hardening scope of 1,830 miles in the 2025-2028 GRC time period.
- (3) Of those 110 miles, approximately 85 miles would not be selected for TUG under the GRC Proposed Decision's (PD's) authorization (meaning approximately 25 miles would be selected based on cumulative isolatable circuit segment lengths).

The 82-mile reference in SCE's Opening Comments actually pertained to the number of rebuilding miles that were in scope for undergrounding prior to the January events, and only approximately 19 of those miles would be selected for undergrounding by the PD's methodology. SCE is serving this data request response on the GRC service list for full transparency and will submit errata to its Opening Comments if instructed to do so by the Commission.

- i. The attached Excel file, SPD-SCE-WMP2026-005_Q1.xlsx, provides the details behind SCE's calculations. SCE started by utilizing TURN's workpaper titled 1. Risk and Cost Analysis.xlsx within GRC Exhibit TURN-12-WP, to determine the miles of rebuild included in the top 50% of risk. The file titled 1. Risk and Cost Analysis.xlsx, tab RSE Summary Rows 44 – 1,945 contain TURN's calculation of the 50% risk threshold adopted by the PD for TUG. This data is organized by anonymized isolatable segments (column B) and represents SCE's proposed scope (in-flight and hypothetical) for the wildfire covered conductor program (WCCP) and the Targeted Undergrounding Program (TUG) for years 2025 – 2028. This totaled the following overhead circuit miles:

Program	Circuit Miles (2025 – 2028)
WCCP	1,250
TUG	580
Total	1,830

The data in TURN's workpaper was ranked by TUG RSE from highest to lowest (column J on RSE Summary tab of the file titled 1. Risk and Cost Analysis.xlsx).

¹ There are an additional 19 miles in the Eaton rebuild area pending further assessment for potential undergrounding.

TURN then applied the 50% cutoff that was included in the PD, which totaled 177 miles out of the 1,830 proposed (row 510 in RSE Summary tab).

In the attached Excel file titled SPD-SCE-WMP2026-005_Q1.xlsx, SCE took the data from the RSE Summary tab of TURN's file titled 1. Risk and Cost Analysis.xlsx Rows 44 – 1,945 and compared which isolatable segments out of the 1,830 miles are part of the Eaton and Palisades rebuild efforts (column R of SPD-SCE-WMP2026-005_Q1.xlsx, tab TURN-12, 1. Risk and Cost Analy). SCE determined if those anonymized isolatable segments were in the top 50% of risk (which would be included in the PD's authorization) or the bottom 50% of the risk (which would be excluded from the PD's authorization). To stay consistent, SCE used a 1.2 multiplier to account for undergrounding reroute, which gives a result of 80 miles of undergrounding in and adjacent to the Palisades burn scar using TURN's analysis. However, it should be noted that the reroute factors can vary depending on the actual terrain being assessed. Complex terrain in the Palisades area likely contributes to a slightly higher than average reroute factor, which led to the number of actual underground miles for Palisades to be 81.

The following tables, also included in tab Summary Tables of SPD-SCE-WMP2026-005_Q1.xlsx, provide the information cited above.

Total Rebuild Miles (Eaton and Palisades) Included or Excluded from PD's TUG Authorization

Included in PD's Authorization	Circuit Miles	Circuit miles w 1.2x Factor
No	71	85
EATON	20	24
PALISADES	51	61
Yes	21	25
EATON	5	6
PALISADES	16	19
Grand Total	92	110

Total Rebuild Miles (Palisades Only) Included or Excluded from PD's TUG Authorization

Included in PD's Authorization	Circuit Miles	Circuit miles w 1.2x Factor
No	51	61
PALISADES	51	61
Yes	16	19
PALISADES	16	19
Grand Total	66	80

- b. SCE utilized the anonymized isolatable segments that were also included in Confidential_TURN-SCE-039_Q6.xlsx and SPD-SCE-WMP2026-002 Q7.xlsx to provide a list of anonymized isolatable segment IDs that are part of the Eaton and Palisades rebuild efforts (indicated by “Eaton” or “Palisades” in column R of SPD-SCE-WMP2026-005_Q1.xlsx, tab TURN-12, 1. Risk and Cost Analy). If desired, SPD can utilize those files to determine which circuit segments are associated with each isolatable circuit segment in the rebuilds.
- c. See response to question 1.b, above.