

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

R.18-10-007

**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE
(PROPOSED) DECISIONS ON INDIVIDUAL UTILITIES 2019 WILDFIRE MITIGATION
PLANS PURSUANT TO SENATE BILL 901**

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(PROPOSED) DECISIONS ON INDIVIDUAL UTILITIES 2019 WILDFIRE MITIGATION
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TABLE OF CONTENTS

Section		Page
1.	Overview of Wildfire Mitigation Plan -- WMP Responsibility.....	1
2.	Elements of SCE’s WMP -- Cost Estimates.....	1
4.	Inspection and Maintenance -- Enhanced Overhead Inspections (EOI).....	2
5.	System Hardening -- Cost Effectiveness and Efficacy of Covered Conductor, Wooden Pole Replacement, and Undergrounding.....	2
6.	Vegetation Management Plan.....	4
11.	Metrics, Monitoring and Reporting -- Fire Potential Index (FPI) and Customer “Class”.....	6

Pursuant to California Public Utilities Commission (Commission or CPUC) Rule of Practice and Procedure 14.3, Southern California Edison Company (SCE) respectfully submits these Reply Comments on the Proposed Decision Approving SCE’s 2019 Wildfire Mitigation Plan (SCE PD). These Reply Comments respond to the Opening Comments submitted by The Utility Reform Network (TURN), Public Advocates Office (Cal Advocates), Mussey Grade Road Alliance (MGRA), Small Business Utilities Advocates (SBUA), Protect our Communities (POC), and Green Power Institute (GPI).¹

1. Overview of Wildfire Mitigation Plan -- WMP Responsibility

SBUA’s recommendation that the Commission revise the utility-specific PDs to require utilities to provide additional information related to utility personnel “responsibility” for the WMPs should be rejected. To the contrary, it is appropriate for SCE to name a sole individual, specifically Senior Vice President of Transmission and Distribution Phil Herrington, as the person who has overall responsibility and accountability for SCE’s 2019 WMP. This is consistent with both Commission Rule 1.8(c)(2) as well as SCE’s internal corporate governance protocols, as Mr. Herrington has the legal authority to make binding commitments for SCE.²

2. Elements of SCE’s WMP -- Cost Estimates

Despite arguing that cost estimates should have no regulatory significance in this proceeding, Cal Advocates also recommends that SCE should be required to provide detailed and well-supported cost estimates. SCE did, in fact, provide detailed and well-supported cost estimate work papers to Cal Advocates. SCE agrees that cost estimates for WMP activities should be evaluated, and those estimates (within appropriate ranges) along with the scope of work should be approved by the Commission as part of the annual WMP process. As recommended in SCE’s Comments (and Reply Comments) on the Guidance PD, approval of WMP should mean approval of the scope of the programs and activities set forth therein

¹ SCE does not agree with certain comments made by parties not addressed herein and SCE’s silence on any particular matter should not be construed or interpreted as assent or acceptance.

² See SCE March 22, 2019 Reply Comments at p. 26.

and that prudently incurred costs associated with those programs and activities (to be reviewed in future GRCs or other proceedings) will be eligible for future cost recovery.

4. Inspection and Maintenance -- Enhanced Overhead Inspections (EOI)

TURN recommends the Commission ensure that SCE's EOI program does not duplicate its Detailed Overhead Inspection (DOI) program by requiring SCE to submit a Tier 2 Advice Letter (AL) with more details (not the Tier 1 AL the SCE PD would require).³ Requiring an additional Tier 2 AL is not necessary for SCE to further detail how its EOI program is different than its other inspection programs, and inconsistent with GO 96-B filing requirements.⁴

5. System Hardening -- Cost Effectiveness and Efficacy of Covered Conductor, Wooden Pole Replacement, and Undergrounding

Cal Advocates recommends SCE should be required to provide more information on the efficacy and cost-effectiveness of covered conductor. Notwithstanding the required process to further develop performance-based metric, SCE has provided extensive information, analysis, and research on the efficacy and cost-effectiveness of covered conductor compared to alternatives in the CPUC workshops, in discovery (e.g., its Covered Conductor Compendium), and its Grid Safety and Resiliency Program (GSRP) filing.⁵ Accordingly, the Commission should reject Cal Advocates recommendation. SCE's historical data show that over half of all fires associated with distribution infrastructure in HFRA were caused by contact from objects (CFO), making CFO the leading cause of ignition. SCE demonstrated the effectiveness of covered conductor through benchmarking and physical testing by having various objects, such as vegetation,

³ TURN Comments on utility-specific PDs at p. 8.

⁴ In Comments on the SCE PD, SCE, for administrative efficiency, recommended that should the Commission support its request to submit a Tier 2 AL for changes to its non-CPUC High Fire Risk Areas (HFRA), SCE would not have an issue with also including further description of its EOI program in that filing. SCE proposed a number of efficiency recommendations in its Comments on the Guidance and SCE PDs and reiterates those requests here, considering Staff, Commission and parties' resource constraints as well as to be more consistent with General Order (GO) 96-B rules.

⁵ See, e.g., SCE response to TURN-SCE-005, Question 6 in GSRP proceeding (available in SCE's public wildfire mitigation discovery data request repository).

wildlife, balloons, or another covered conductor phase, make contact with energized covered conductor connected to SCE's electrical system. The tests validated that covered conductor will prevent faults due to CFO and, by preventing these faults, covered conductor will reduce the probability of ignition. Other utilities such as United Power in Colorado and Ausnet in Australia have provided real-world examples of covered conductor preventing faults and potential ignition when trees fell into powerlines. Additionally, SCE has provided a thorough analysis comparing the cost and effectiveness of covered conductor and its alternatives (*i.e.*, bare wire and underground cable), and demonstrating the overall cost-effectiveness of the former.⁶

POC expresses concern that SCE has not demonstrated that covered conductor is effective. As discussed above, SCE has provided extensive information, analysis, and research on the efficacy and cost-effectiveness of covered conductor compared to alternatives. Additionally, SCE has provided a thorough analysis that involved calculating the relative potential likelihood that a specific fault would be associated with an ignition event, determining if covered conductor will reduce or eliminate specific faults, and calculating the overall effectiveness of covered conductor.⁷ SCE has sufficiently demonstrated that covered conductor provides the most overall value to customers in terms of addressing increasing wildfire risk.

POC disputes the effectiveness of pole replacement at preventing wildfires and states that “[n]o evidence has been provided that wooden poles are not able to bear these loads or that they do not survive wildfire.”⁸ To the contrary, there is ample evidence that standard wood poles do not typically survive wildfires. For example, during restoration following the recent Woolsey fire, SCE replaced 1,890 wood poles that were unsuitable to be placed back into service. Additionally, POC fundamentally misunderstands the position that SCE has clearly stated in its WMP and further supported by information in SCE's GSRP

⁶ See November 2018 Mitigation Effectiveness Comparison amended workpaper in GSRP (available in SCE's public wildfire mitigation discovery data request repository and provided directly to Mr. Abrams in response to Abrams-SCE-001, Q.1).

⁷ See November 2018 Mitigation Effectiveness Comparison amended workpaper in GSRP (available in SCE's public wildfire mitigation discovery data request repository and provided directly to Mr. Abrams in response to Abrams-SCE-001, Q.1).

⁸ POC Comments on PD Approving Wildfire Mitigation Plans at p. 16.

filing that pole replacements are not intended to prevent ignitions; rather, their value is associated with increased survivability of fire-resistant poles, providing public safety benefits.² SCE performs pole-loading calculations to determine adequacy of existing/new installations. Pole replacements may be required as part of covered conductor installation efforts, however the incremental material cost for resilient pole designs is relatively immaterial. SCE is also developing cost-effective methods for installing fire-resistant pole wraps on existing standard wood poles to further improve infrastructure resiliency in locations where existing poles are found to be compliant with pole-loading standards. Finally, in its WMP, SCE made clear that it is evaluating whether undergrounding in select locations might be preferable to alternative mitigations efforts, such as covered conductor.¹⁰

6. Vegetation Management Plan

TURN argues that SCE should not be allowed to remove healthy trees without a showing of “substantial risk to utility equipment during wildfire ignition conditions.”¹¹ As discussed in SCE’s 2019 WMP and GSRP filings, SCE has implemented a Hazard Tree Management Program (HTMP) in which SCE will assess individual trees located up to 200 feet away from SCE’s electrical facilities (the area designated as the “utility strike zone”) to determine if the trees, or portions thereof, create a risk of contacting overhead lines. SCE’s HTMP is based on industry standards in which trees located in CPUC Tier 2 or 3 HFTD are assessed by a qualified Tree Risk Assessor (ISA Certified Arborist) to identify whether particular tree attributes and/or site conditions could cause the tree to fail. These assessments are performed using industry best practices by certified experts; they are not arbitrary. SCE utilizes a HTMP Tree Risk Calculator developed using industry methodology to determine a risk score for each individual tree assessed and prioritizes the appropriate mitigation based on the risk score of each tree. The bulk of the HTMP score is derived from granular and specific site conditions (*i.e.*, history of failure, topography, site changes, soil

² For example, continuous electric service for water conveyance systems necessary to combat the blaze, traffic signal operation to ease congestion during evacuation scenarios, and avoidance of damaged electric poles blocking roads impeding ingress and egress for evacuation and first responders.

¹⁰ See SCE WMP at Chapter 4.3.4 (SH-2).

¹¹ TURN Comments on utility-specific PDs at pp. 8-9.

conditions, common weather patterns) and individual tree defects (*i.e.*, crown and branches, trunk, and root and root collar). SCE will only remove living trees if the tree has been assessed by the certified arborist and found to pose a calculated risk of failure based on the tree's attributes and/or site conditions.

Removing living trees is sometimes unfortunately necessary to protect human life and property. SCE's vegetation management group internally tracks data of Tree Caused Circuit Interruptions (TCCIs). That data demonstrates that the vast majority of TCCIs are caused by living trees, not dead or dying trees. For example, in 2017 SCE experienced 532 TCCIs, of which 468 (*i.e.*, 88%) were caused by failure of a living tree or a portion of a living tree. Similarly, in 2018 SCE experienced 411 TCCIs, of which 315 (*i.e.*, 77%) were caused by failure of a living tree or a portion of a living tree.¹² SCE's empirical data overwhelmingly demonstrates that living trees pose a substantial risk of contacting utility distribution infrastructure and thus potentially causing an ignition.¹³

POC claims that unnecessarily cutting down trees will "exacerbate" global warming.¹⁴ As described above, SCE does not plan to remove living trees unless necessary based on the risk they pose to potentially cause an ignition. SCE is a strong advocate for the environment, and recognizes the benefits trees play, not only in beautifying neighborhoods, but also in reducing carbon impact and GHG effects. But wildfires present a grave and growing threat to California's citizens and its environment; SCE (with the approval of and at the direction from the Governor, the Legislature, and this Commission), has an obligation to take steps within its reasonable control to mitigate wildfire risks associated with trees. SCE also notes that according to the U.S. Geological Survey (USGS), California's 2018 wildfires are estimated to have released emissions roughly equivalent to 68 million tons of carbon dioxide.¹⁵ This amount is approximately 15% of

¹² In a data request to MGRA (Set One, Question 14 –available in SCE's public wildfire mitigation discovery data request repository), SCE provided historical TCCI information, and provides further detail here in response to TURN's arguments in its Opening Comments.

¹³ For the reasons described herein, and that will be further detailed in SCE's GSRP Rebuttal (due May 31, 2019), TURN's Comments on utility-specific PDs (p. 2, FN 7) should be given no weight, as TURN misconstrues and misrepresents SCE's vegetation management data; in addition it is simply incorrect that a "dry season" only occurs in summer during the current reality of a year-round fire-season.

¹⁴ See POC Comments on PD Approving Wildfire Mitigation Plans at p. 16.

¹⁵ <https://www.doi.gov/pressreleases/new-analysis-shows-2018-california-wildfires-emitted-much-carbon-dioxide-entire-years>

all GHG emissions for the entire state (*i.e.*, many orders of magnitudes more than the GHG effects associated with SCE removing a small number of live trees to safeguard the public).

GPI asserts that the utilities should include residue-management plans as part of their vegetation management programs and that they should use these plans to pursue public outreach and education. SCE previously explained in its Reply Comments making clear that when SCE crews clear vegetation to maintain the required clearances, as a general rule, all vegetation is removed.¹⁶ There are instances where SCE has agreements with customers and/or municipalities to leave the trimmed vegetation at the location for other uses by those stakeholders. SCE also performs, and will continue to perform, public outreach and education on vegetation management practices in the communities it serves.

11. Metrics, Monitoring and Reporting -- Fire Potential Index (FPI) and Customer “Class”

MGRA recommends the Commission order the utilities to work together on a common definition of FPI so that the data will be of a common format. FPI is an internal tool, having three categories (normal, elevated, and extreme), and is used to estimate wildfire potential based on local weather and fuel conditions.¹⁷ Currently, SCE’s FPI is the best method for assessing fire potential across the SCE service territory. However, since the initiation and the spread of wildfires is dependent on a multitude of factors, it is difficult for a single index to capture all of these dynamic influences. As such, any common definition of FPI should take into account utility-specific data inputs such as differing terrain features, fuel, and fire environments that exist across the state. MGRA also incorrectly asserts that the Commission should direct utilities to only focus on wind speed data in their risk mitigation programs as opposed to all weather-related data. The occurrence of strong winds alone does not necessarily result in a large fire: Weather *and* fuel conditions are important and interdependent factors that contribute to the likelihood of sustained combustion events.¹⁸

¹⁶ See SCE’s Reply Comments at p. 16 and footnote 60.

¹⁷ Local weather inputs include wind speed and the dryness of the air near the ground. The FPI also considers how receptive fuels are to fire with specific inputs involving the moisture content of the vegetation.

¹⁸ Fuels not only have to be dry enough, but they also have to be continuous enough to support large fire activity. Furthermore, weather conditions have to be conducive for a fire to spread quickly and for it to become well

SBUA supports the Commission’s emphasis on outcome-based metrics and recommends that the Commission modify the PDs to require metrics be broken down by “customer class.” SCE addresses the PDs’ overall guidance on outcome-based metrics in its Comments on the Guidance PD. SBUA’s specific recommendation to show metrics split out based on customer class should be rejected. SCE’s wildfire mitigation programs and activities are completely and appropriately agnostic as to customer class, type, socioeconomic status, and all other possible customer-differentiating characteristics. SCE prioritizes its wildfire mitigation efforts in the areas that pose the highest wildfire and resulting public safety risk. If the Commission does adopt outcome-based metrics, they should not be differentiated based on any particular “class” of customers, and instead should be strictly focused on measuring program effectiveness in reducing overall wildfire risk.

Respectfully submitted,

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May 28, 2019

established in the vegetation. This means that along with wind, humidity levels must be low enough for an extended period of time to sufficiently dry out the vegetation.

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R.18-10-007

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE (PROPOSED) DECISIONS ON INDIVIDUAL UTILITIES 2019 WILDFIRE MITIGATION PLANS PURSUANT TO SENATE BILL 901** on all parties identified on the attached service list(s) **R.18-10-007**. Service was effected by one or more means indicated below:

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**ALJ Peter V. Allen
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California Public Utilities Commission
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Executed on **May 28, 2019**, at Rosemead, California.

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[TOP OF PAGE](#)

[BACK TO INDEX OF SERVICE LISTS](#)