

*Southern California Edison*  
*R.18-10-007 – SB 901*

**DATA REQUEST SET S E D - S C E - 0 0 4**

**To: SED**  
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**Job Title: Senior Manager**  
**Received Date: 3/7/2019**

**Response Date: 3/12/2019**

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**Question 09 a-h: TOPIC - R.18-10-007 Wildfire Mitigation Plan**

9. Provide top dozen (12) fire ignition events by deaths/serious injuries/acreage burned/structures destroyed/structured damaged in last 10 years. Provide data fields included in fire incident collection data and the following:

- a. Tier 3, Tier 2 or SCE HRTA (non-Tier 2/3)
- b. Red Flag Warning days
- c. Other high risks scenarios such as known high winds
- d. Deaths associated with event
- e. Serious injuries associated with event
- f. Approximate structures destroyed associated with event
- g. Approximate structures damaged associated with event
- h. Known AND/OR suspected/alleged ignition causes, even if litigation is pending.

**Response to Question 09 a-h:**

SCE objects because the question calls for materials protected by the attorney-client privilege and attorney work product doctrines. SCE further objects as the question calls for speculation and the provision of ultimate legal conclusions about “alleged ignition causes” of certain wildfires, which is especially inappropriate given that SCE does not have access to all of the relevant evidence that would inform such a determination, as it is under the exclusive control of CAL FIRE or other investigating agency while its investigations are ongoing. SCE further objects on the grounds that the request is: overbroad in seeking information regarding fires from the last 10 years and is not limited to ignitions associated with SCE electrical infrastructure; vague as to certain terms (*e.g.*, “serious injuries,” various items “associated” with the events); ambiguous in structure (*i.e.*, which of the enumerated factors would inform the ranking order for the “top dozen” fires?); and beyond the scope of the proceeding. SCE’s 2019 Wildfire Mitigation Plan sets forth proposed activities and programs that SCE plans to undertake in 2019 to mitigate wildfire risk. Further, SCE notes that some of the requested information is publicly available on CAL FIRE’s website. For example, at [http://cdfdata.fire.ca.gov/incidents/incidents\\_statsevents](http://cdfdata.fire.ca.gov/incidents/incidents_statsevents), a viewer can click through to links on (among other things):

- Top 20 Largest California Wildfires (including the “cause” if determined)
- Top 20 Most Destructive California Wildfires (including the “cause” if determined)
- Top 20 Deadliest California Wildfires (including the “cause” if determined)

- Historical Wildfire Activity Statistics
- CAL FIRE Jurisdiction Fires, Acres, Dollar Damage, and Structures Destroyed (1933-2016)
- Wildland Fires and Acres – All Jurisdictions (1987-2016)

Notwithstanding the foregoing objections, SCE responds as follows. Over the last three years (May 2014 – December 2017), the “top dozen” fires,<sup>1</sup> in terms of acreage, associated with SCE electrical infrastructure, as defined by the Commission in the required annual SCE Fire Incident Data Report, are as follows:

Date	Time	Size	Fire Area	Red Flag
8/18/2016	14:52	7,474 Acres	Tier 3	Yes
2/6/2015	13:15	7,000 Acres	Tier 2	No
7/7/2017	12:00	2,940 Acres	SCE - BL 322	Yes
6/13/2014	13:00	2,545 Acres	Tier 3	No
6/24/2016	5:16	654 Acres	SCE - BL 322	Yes
7/8/2016	11:15	554 Acres	Tier 2	No
6/4/2016	16:06	465 Acres	Tier 3	No
6/10/2017	12:17	100 - 299 Acres	Tier 3	No
5/15/2017	13:54	100 - 299 Acres	Tier 2	No
7/13/2015	11:15	100 - 299 Acres	Tier 3	No
8/12/2017	16:34	10 - 99 Acres	None	No
8/24/2016	16:37	10 - 99 Acres	Tier 2	No
5/29/2016	22:25	10 - 99 Acres	Tier 2	No
4/28/2016	14:00	10 - 99 Acres	Tier 3	No
4/15/2016	7:12	10 - 99 Acres	Tier 3	No
11/7/2015	2:24	10 - 99 Acres	Tier 3	No

<sup>1</sup> Due to data limitations, SCE is providing the “top twenty-one” fires, not the “top dozen” from the analyzed historical period. Fire acreage size was taken from the CAL FIRE website and only contained information on fires larger than 300 acres. For purposes of this data request response, SCE is categorizing wildfires according to the currently-defined HFRA status associated with their ignition points (*i.e.*, not necessarily the historical HFRA status at the time) and is also categorizing wildfires according to the RFW conditions in effect at the time of their respective ignition events. Moreover, because of the pending nature of the relevant investigating-agency inquiries as well as associated litigation related to the 2017 Thomas and Rye, and the 2018 Woolsey fires, SCE has excluded them from this list. Although those fires were sizeable, causal investigations regarding those fires remain ongoing, and SCE therefore did not include them in its respective annual Fire Incident Data Reports submitted to the CPUC. For informational purposes, relevant information regarding those fires is as follows: Thomas (Tier 3, RFW yes), Rye (Tier 3, RFW yes), and Woolsey (Tier 3, RFW yes).

<b>9/3/2015</b>	17:00	10 - 99 Acres	Tier 2	No
<b>7/3/2015</b>	15:02	10 - 99 Acres	Tier 3	No
<b>6/5/2015</b>	14:40	10 - 99 Acres	SCE - BL 322	No
<b>2/22/2015</b>	9:52	10 - 99 Acres	Tier 3	No
<b>6/23/2014</b>	13:15	10 - 99 Acres	Tier 2	No