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CEJA Comments on Wildfire Mitigation Plans, R.18-10-007
Attachment 2: SCE Data Request Responses

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

DATA REQUEST SET C E J A - S C E - 0 0 1

To: CEJA
Prepared by: Russell Archer
Job Title: Senior Attorney
Received Date: 2/15/2019

Response Date: 2/22/2019

Question 1: 1. California Executive Order N-05-19 requires consideration of “socioeconomic factors and vulnerable populations that exacerbate the human toll of wildfires” when CAL FIRE develops a “[m]ethodology to assess which communities are at the greatest risk from wildfire and the projects within/nearby areas that would reduce the threat of a catastrophic wildfire if completed.” When developing your prioritization for hardening the grid, have you considered “socioeconomic factors and vulnerable populations that exacerbate the human toll of wildfires”? If you have, please describe how these factors were considered in the evaluation of how to prioritize projects to harden the grid. If you have not, please describe why these factors have not been considered and any plans you may have to consider these populations in the future.

Response to Question 1:

California Executive Order N-05-19 requires CAL FIRE in consultation with other State agencies and departments, not the investor-owned electric utilities, to provide a report to the Governor, which among other things, should consider “socioeconomic factors and vulnerable populations that exacerbate the human toll of wildfires.” The Executive Order contemplates that this effort will inform future “local grants [that] will focus on community engagement and public education in high-risk areas with an emphasis on public health and safety.” SCE looks forward to reviewing that forthcoming report from CAL FIRE. The grid hardening activities and programs in SCE’s 2019 Wildfire Mitigation Plan (WMP) are focused on prioritizing the highest fire-risk areas in SCE’s service territory as those risks pertain to electrical infrastructure. SCE’s WMP is agnostic to the particular socioeconomic conditions in any individual high fire risk area; SCE is committed to protecting public safety irrespective of those differences. Moreover, SCE’s WMP describes in detail in Chapter 5 how SCE communicates with and assists vulnerable customers during emergencies (e.g., wildfires), including those customers with lower socioeconomic status.

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To: CEJA
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Response Date: 2/22/2019

Question 2: 2. As described by California Executive Order N-05-19, how do you define populations that are at the greatest risk from wildfires due to socioeconomic factors?

Response to Question 2:

Please see SCE's response to Question No. 1.

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DATA REQUEST SET C E J A - S C E - 0 0 1

To: CEJA
Prepared by: Cameron McPherson
Job Title: Senior Project Manager
Received Date: 2/15/2019

Response Date: 2/22/2019

Question 3: 3. San Diego Gas & Electric’s plan includes Community Resilience Centers. Are you also planning to develop Community Resilience Centers for communities at risk from wildfires and deenergization? If so, please describe the work you anticipate doing in 2019 to develop these centers. If not, please describe why not. In your response, please describe whether your plan will include: transportation for community members that do not have access to transportation, filtered air if outside air quality is poor, and whether your plan includes work with community organizations and translators to ensure that hard-to-reach and linguistically isolated populations are aware of these centers.

Response to Question 3:

In addition to a multifaceted outreach program aimed at educating customers, county Offices of Emergency Management (OEM), local and tribal governments, public safety agencies and community members (including selected groups through specialized workshops) on the importance of community resiliency (see Section 4.6.5 of the Wildfire Mitigation Plan for additional details), SCE will be working closely with county OEMs to deploy mobile Community Outreach Vehicles equipped with back-up power, water, snacks, and other sundries so that customers can charge their personal devices (mobile phones, tablets, laptops, etc.) and continue to receive information/updates from SCE about the outage, listen for relevant public safety broadcasts, and/or connect with friends and family concerned with their well-being during Public Safety Power Shutoff events.

In the event that a wildfire does threaten a community, SCE will activate additional measures according to the Disaster and Emergency Preparedness Plan, as noted in Section 5.2 of the Wildfire Mitigation Plan. This plan includes additional provisions for reaching customers during and following wildfire events based primarily on impacted customer population. These methods are described below:

- * Toll-free (1-800) phone line staffed with trained resources in SCE’s customer contact center who receive calls from impacted customers as a priority; they provide customer-service-related protections to customers.
- * Home page alerts on SCE.com that directs customers to a dedicated webpage regarding consumer protections.
- * Targeted paid social media campaigns to areas specifically impacted by a disaster (e.g., a wildfire) to inform customers about emergency protections available to those impacted by a specific disaster.
- * Trained staff deployed to local assistance centers to work in-person with impacted customers, and advertising on city/county websites about services offered by SCE at these venues.
- * Media releases to inform customers about protections and direct customers to reach SCE through its website or via the toll-free (1-800) phone line.

* Outreach to partnering community-based organizations that serve income-eligible customers to enable awareness of customer-service protections for their organizations' staff who might be working with SCE customers.

SCE will continue adapting its outreach efforts to further educate customers and local government officials, enhance partnerships, increase awareness, and discuss lessons learned.

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DATA REQUEST SET C E J A - S C E - 0 0 1

To: CEJA
Prepared by: Kari Gardner
Job Title: Senior Manager
Received Date: 2/15/2019

Response Date: 2/22/2019

Question 4: 4. With respect to community outreach, how do you plan to conduct outreach to community members who do not speak one of the languages that the material is available in and do not have ready access to the internet? Do you plan to work with community based organizations populations that have been hard to reach? Do you plan to host community meetings? Where do you plan to host community meetings in 2019

Response to Question 4:

SCE's PSPS fact sheets have been translated into the five most commonly-spoken languages in SCE's service territory, namely English, Spanish, Chinese, Vietnamese and Korean. SCE's community outreach activities are also broader and wide-ranging, and include one-on-one outreach to members of the community. SCE does plan to conduct community meetings in 2019. The community meetings will take place across the service territory in areas where customers are served by circuits in high fire risk areas and where community meetings were not held in 2018. The community meetings are generally coordinated with local government and public safety officials, as well as local non-profit organizations such as the American Red Cross. SCE will also continue to partner with community based organizations (CBOs) to identify how CBOs can assist with outreach and education related to emergency preparedness to vulnerable populations they serve. We also seek to learn from CBOs about special needs and how to best communicate about the PSPS program with these vulnerable communities.

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DATA REQUEST SET C E J A - S C E - 0 0 1

To: CEJA
Prepared by: Breanna Medina
Job Title: Advisor
Received Date: 2/15/2019

Response Date: 2/22/2019

Question 5: 5. San Diego Gas & Electric Company’s plan has a warning system that allows for advanced preparation in the event of potential wildfire and/or deenergization conditions. Do you plan to have a similar warning system? If so, please describe your planned system. If not, please describe why not?

Response to Question 5:

SCE has an established response plan for wildfire operations that includes using situational awareness tools to regularly monitor predicted weather in the service territory, inform the need for necessary response operations and conduct on-going communications for early warning of possible impacts to its ability to safely provide power. Within 48 hours of a potential event forecasted in the service territory, SCE makes every attempt to establish and maintain on-going communications with stakeholders; including public safety agencies, local government officials and customers that may potentially be impacted by the need for pro-active de-energization. This advance warning allows time for collaboration on the impacts that potential de-energization may have on both local communities and individuals. Additional ongoing communications on the status of any actual pro-active de-energizations is continuously shared with stakeholders through the duration of the incident until power is restored and response operations are no longer necessary.

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DATA REQUEST SET C E J A - S C E - 0 0 1

To: CEJA

Prepared by: Cameron McPherson

Job Title: Sr. Project Mgr.

Received Date: 2/15/2019

Response Date: [2/22/2019](#)

Question 7: 7. With respect to back-up generators for mitigating the impacts of deenergization, what technologies are you examining for back-up generators?

Response to Question 7:

With respect to the temporary deployment of mobile back-up generators to mitigate the impacts of de-energization, mobile diesel-powered units are the only mobile generation technology that is readily and widely available, easily transported, easily serviced/refueled, cost effective, and a reliable means of effectively serving the electrical demands of essential service providers. SCE will continue to explore new non-diesel and renewable technologies as they become more readily available.

With respect to permanent back-up generators installed by our customers, SCE will support our customers in selecting the best back-up generation/storage technology that meets their business and resiliency needs while ensuring all local, state, and federal rules and regulations are followed to ensure the safety of such back-up system and its integration with the grid.

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DATA REQUEST SET C E J A - S C E - 0 0 2

To: CEJA
Prepared by: Kristi Gardner
Job Title: Senior Advisor
Received Date: 2/28/2019

Response Date: 3/5/2019

Question 1: What percentage of your customers in Tier 2 or Tier 3 areas do not speak one of the five languages into which you plan to translate your outreach material?

Response to Question 1:

Historically, the five languages mentioned are the more commonly-spoken languages by our customers. SCE does not currently track languages outside of these five.

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DATA REQUEST SET C E J A - S C E - 0 0 2

To: CEJA
Prepared by: Kristi Gardner
Job Title: Senior Advisor
Received Date: 2/28/2019

Response Date: 3/5/2019

Question 3: In the event of a wildfire, what plans do you have to ensure that customers impacted by the wildfire are aware of it? Do you have plans for linguistically isolated community members? Do you have plans if the cell-phone tower goes down?

Response to Question 3:

In the event of a wildfire, it is ultimately the responsibility of the lead jurisdiction(s)'s emergency management and public safety officials to notify their communities of the situation. Cellular communication companies are responsible for having back-up generation in the event of emergencies, and SCE has recently coordinated with several such companies regarding those issues. In addition, as described in detail in Chapters 5.2.3 and 5.3 of SCE's 2019 Wildfire Mitigation Plan, SCE has extensive community outreach, and programs for customers to prepare for wildfires and to support customers in their aftermath.

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DATA REQUEST SET C E J A - S C E - 0 0 2

To: CEJA
Prepared by: Raymond Fugere
Job Title: Senior Manager
Received Date: 2/28/2019

Response Date: 3/5/2019

Question 5:

With relation to ignitions caused by equipment failure that are discussed in your plan, have you completed any analysis of how effective inspections have been in identifying equipment that may fail? For example, was any of the equipment that caused an ignition identified in an inspection before the ignition as needing replacement? If so, please identify the percentage of equipment that was identified as needing replacement before the ignition. Do you expect the ability of inspections to identify problematic equipment to change with the enhanced inspections described in your Plan?

Response to Question 5:

SCE has not completed an analysis of how effective its inspections have been in identifying equipment prior to failure.

SCE interprets the question “was any of the equipment that caused an ignition identified in an inspection before the ignition” to mean the exact equipment that failed and that was scheduled for replacement at the time of the fire that was associated with that equipment. SCE utilized SAP maintenance records, cross-checked those records with its fire data, and looked for exact equipment matches. This examination did not identify any pending maintenance items at the time of the fires for the equipment that failed.

SCE expects Enhanced Overhead Inspections to improve SCE’s ability to detect potentially problematic equipment through a combination of factors including, but not limited to, increased frequency of inspections for higher-risk elements and use of more advanced sensing technology such as infrared and Corona scanning to identify conditions not detectable through traditional visible methods.

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DATA REQUEST SET M G R A - S C E - 0 0 1

To: MGRA
Prepared by: Peter Lee
Job Title: Senior Business Analyst
Received Date: 3/3/2019

Response Date: 3/7/2019

Question 15: Are all trees of “at risk” or “reliability” species within the “strike zone” of utility equipment planned for trimming or removal? If arborist discretion is to be used, what factors will be used to determine which trees will be trimmed or removed, and what approximate fraction of “at risk” or “reliability” tree species will be trimmed or removed as enhanced vegetation management is implemented?

Response to Question 15:

All trees identified as “at risk” or “reliability” within the “strike zone” in 2019 will be planned for trimming and/or removal.

Factors and approximate fraction of “at risk” or “reliability” tree species are calculated through a risk matrix in a Tree Risk Assessment Tool, which takes into consideration:

- Overall Tree Condition
- Tree Defects
- Site Conditions
- Tree Lean
- Tree Height Factor
- Likelihood of Line Impact

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DATA REQUEST SET M G R A - S C E - 0 0 1

To: MGRA
Prepared by: Peter Lee
Job Title: Senior Business Analyst
Received Date: 3/3/2019

Response Date: 3/7/2019

Question 17: How many instances of outages due to vegetation contact or fall-in occurred over the last five years for circuits using covered conductor or “tree wire”? How many ignitions? What is the rate per deployed mile of vegetation-caused outages and vegetation-caused ignitions for covered conductor? How does this compare to bare conductor?

Response to Question 17:

SCE objects to the question as it is overly broad, unduly burdensome, and because it is beyond the scope of this proceeding. SCE’s 2019 Wildfire Mitigation Plan (WMP) is comprised of mitigation and activities SCE plans to undertake in 2019 to reduce wildfire risk and not historical data from the last five years. Notwithstanding these objections, SCE responds as follows.

Over the last 5 years, SCE infrastructure has had a de minimis level of covered conductor deployed. SCE deployment of covered conductor only started in earnest in 2018. Additionally, SCE does not track outages or ignitions based on type of conductor.

Regarding vegetation-associated ignitions, SCE records fire data in accordance with CPUC Decision 14-02-015, which established the Fire Incident Data Collection Plan for utilities. Pursuant to this decision, SCE Fire Incident Data records currently does not track ignitions based on the type of conductor.