BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED
11/08/24
04:59 PM
R1505006

Order Instituting Rulemaking to Develop and Adopt Fire-Threat Maps and Fire-Safety Regulations.	Rulemaking 15-05-006

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) PETITION FOR MODIFICATION OF DECISION 17-12-024 TO UPDATE HIGH FIRE THREAT DISTRICT BOUNDARIES IN ITS SERVICE TERRITORY

CLAIRE E. TORCHIA
PETER SHAKRO

Attorneys for

SOUTHERN CALIFORNIA EDISON COMPANY
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (213) 544-8594
E-mail: Peter.Shakro@sce.com

Dated: **November 8, 2024**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop and Adopt Fire-Threat Maps and Fire-Safety Regulations.	Rulemaking 15-05-006

SOUTHERN CALIFORNIA EDISON COMPANY'S (U-338-E) PETITION FOR MODIFICATION OF DECISION 17-12-024 TO UPDATE HIGH FIRE THREAT DISTRICT BOUNDARIES IN ITS SERVICE TERRITORY

Pursuant to California Public Utilities Commission ("Commission") Rule of Practice and Procedure 16.4, Southern California Edison Company ("SCE") respectfully submits this Petition for Modification of Decision ("D.") 17-12-024, the Commission's Decision Adopting Regulations to Enhance Fire Safety in the High Fire-Threat District ("Petition"). In this Petition, SCE seeks to update the Commission's High Fire Threat District ("HFTD") map relating to specific areas in SCE's service area that, after careful analysis, SCE has concluded should either be added or removed from the HFTD.

I.

FACTUAL BACKGROUND

A. The Commission Adopted An HFTD Map

In 2017, the Commission adopted a work plan for developing a map that designates areas in California "where there is an elevated hazard for utility-associated wildfires to occur and spread rapidly, and where communities face an elevated risk from utility-associated wildfires"[1] (the "HFTD Map"). In D.17-12-024, the Commission also set forth a series of policy and

[1] D.17-01-009, *Decision Adopting a Work Plan for the Development of Fire Map 2*, p. 2; D.20-12-030, *Decision Modifying the High Fire-Threat District Boundaries in Southern California Edison Company's Service*, pp. 1-2.

regulatory changes that affect how utilities treat high-fire threat districts within their respective service territories. Among other things, D.17-12-024 adopted the addition of an HFTD designation to General Order ("GO") 95 requirements, consisting of "Zone 1" (*i.e.*, tree mortality-associated high hazard zones), "Tier 2" (*i.e.*, elevated wildfire risk areas), and "Tier 3" (*i.e.*, extreme wildfire risk areas).[2] That decision also required utilities to implement enhanced wildfire mitigation activities in the HFTD. On November 21, 2017, the Commission's Safety and Enforcement Division ("SED") filed a summary report detailing the production of the Commission's HFTD Map.[3] The Commission adopted the HFTD Map via SED's disposition of a Tier 1 Advice Letter on January 19, 2018.[4]

B. The Commission Granted SCE's 2019 Petition to Modify the HFTD Map

On August 19, 2019, SCE filed a petition to modify D.17-12-024 ("2019 Petition") to add certain small geographical areas—referred to as polygons—to the HFTD Map.[5] SCE's 2019 Petition sought to align the Commission's HFTD Map with SCE's internal High Fire Risk Area ("HFRA") designations by adding certain polygons, collectively totaling 124 square miles to the HFTD, based on a multi-factor, risk-informed analysis.[6]

In D.20-12-030, the Commission approved, with limited modifications, SCE's proposed changes to the HFTD boundaries.[7] The Commission noted that relevant criteria used "for reviewing proposed changes in the development of the CPUC Fire-Threat Map" included the following:

---

2 D.17-12-024, *Decision Adopting Regulations to Enhance Fire Safety in The High Fire-Threat District,* p. 9.

3 *Independent Review Team Final Report on the Production of the CPUC's Statewide Fire Map 2*, dated November 21, 2017, *available at* http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M199/K508/199508442.PDF.

4 Advice Letter 52111-E/3172-E.

5 Southern California Edison Company's (U 338-E) Petition for Modification of Decision 17-12-024, dated August 19, 2019, *available at* https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M311/K289/311289489.PDF.

6 *See* D.20-12-030, pp. 3-4; SCE's 2019 Petition, p. A-3.

7 The Commission approved 37 out of 43 polygons that SCE proposed to be included in the HFTD Map. D.20-12-030, p. 6.

- fuel type, density and arrangement;
- climate influences on moisture content distributions;
- climatology of fire weather (fire wind speeds and directions, temperature, precipitation);
- terrain (slope, ruggedness, access, and fire break); and,
- geographical context to other key land and fuel features, including local populations, structures, and roads.[8]

No single factor was dispositive to the determination of whether to designate additional polygons as HFTD. The Commission concluded that the "areas identified in SCE's petition, as modified by [the] decision, are areas where there is an elevated or extreme risk (including likelihood and potential impacts on people and property) from wildfires associated with overhead utility power lines or overhead utility power-line facilities also supporting communication facilities; these areas are therefore appropriate for inclusion in the High Fire-Threat District."[9]

In the approximately four years since the disposition of SCE's 2019 Petition, SCE's wildfire risk analysis has matured as SCE has gained access to more recent and spatially granular data.

C. Cal Advocates Requests More Frequent Updates to the HFTD Map

On April 19, 2023, the Public Advocates Office at the Commission ("Cal Advocates") filed a petition to modify three decisions related to the establishment of the HFTD Map.[10] Although the Commission previously noted an intent that utilities recommend updates to the HFTD Map every ten years,[11] Cal Advocates requested that utilities be required to update the HFTD Map with respect to each of their service territories "immediately, and on an ongoing

---

8 *Id.*, p. 5.
9 *Id.*, p. 8.
10 *Public Advocates Office's Petition for Modification of Decision (D.) 20-12-030, D.17-12-024, and D.17-01-009 in Order to Update High Fire Threat District Mapping*, *available at* https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M506/K523/506523174.PDF ("Cal Advocates Petition").
11 D.17-01-009, p. 50.

basis every five years" based on each utility's "most up to date assessments of wildfire risk."[12] Cal Advocates argues that "statewide wildfire mapping does not capture all the areas where catastrophic wildfires could occur," and that more frequent updates to HFTD boundaries would better serve public safety.[13] As explained in SCE's response to Cal Advocates' Petition, SCE agrees that a recurring update process for the HFTD Map at least once every five years is reasonable and appropriate.[14] As of the date of this Petition, Cal Advocates' April 19, 2023 petition is pending.

II.

ARGUMENT

A. SCE's Petition Is Timely

Commission Rule of Practice and Procedure 16.4(d) ("Rule 16.4(d)") provides that if more than one year has elapsed since the effective date of the decision proposed to be modified, "the petition must also explain why the petition could not have been presented within one year of the effective date of the decision." SCE's Petition is timely because SCE did not complete the analysis supporting the Petition until 2024, based on the most recent wildfire risk information available. Under similar circumstances, the Commission determined that SCE was justified in filing its 2019 Petition to modify the HFTD boundaries more than one year after the effective date of the relevant decision.[15] The same reasoning applies equally here, and the Commission should find that SCE is justified in filing this Petition more than one year after the effective date of the relevant decision.

---

[12] Cal Advocates Petition, p. 10.

[13] Cal Advocates Petition, pp. 7, 9-10.

[14] Joint Response of Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Bear Valley Electric Service, Inc., Liberty Utilities, and Pacificorp to the Public Advocates Office's Petition for Modification of Decision (D.) 20-12-030, D.17-12-024 and D.17-01-009 In Order to Update High Fire-Threat District Mapping, pp. 2-3, *available at* https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M509/K292/509292035.PDF.

[15] D.20-12-030, p. 4 ("Because SCE did not complete the report on which the petition is based until mid-2019, the petition's late submission is justified.").

Moreover, although Rule 16.4(d) requires an explanation for filing a petition more than one year after the effective date of a decision, the application of Rule 16.4(d) to the Petition is inapposite because the Commission has expressed an intention to update the HFTD Map in ten-year cycles.[16] SCE filed its 2019 Petition approximately five years ago. Thus, SCE's Petition is also timely because SCE is proposing its modifications to the HFTD Map approximately five years before the expiration of the current ten-year cycle.

B. Commission Precedent Supports the Proposed Updates to the HFTD Map

With this Petition, SCE includes a rigorous and detailed analysis supporting each of the polygons that SCE proposes to add or remove from the HFTD (the "Report"). SCE created the Report supporting this Petition through evaluations conducted by a multi-disciplinary team of SCE employees with subject matter expertise in fire management and response, fire behavior, fuels, meteorology, grid operations, risk management, wildfire operations, and geospatial analysis.[17] The Report is the result of extensive analysis, encompassing hundreds of hours spent reviewing multiple data sources, assessing local conditions, conducting field surveys, holding meetings and discussions, and vetting recommendations with senior executives and other key stakeholders.[18]

SCE's proposed modifications would add approximately 40 square miles to the HFTD, representing a modest 0.07% net increase of HFTD within SCE's service area.[19] The Report is attached as Appendix C, and the methodology used to produce the Report is summarized below.

---

16 D.17-01-009, p. 50 ("Consistent with the recommendation in the Workshop Report, we intend to update Fire Map 2 in ten-year cycles.").

17 Appendix A, Declaration of Raymond Fugere in Support of Southern California Edison Company's Petition for Modification of Decision 17-12-024 to Update High Fire-Threat District Boundaries In Its Service Territory ("Fugere Declaration"), ¶ 3.

18 Appendix A, Fugere Declaration, ¶¶ 4-5.

19 SCE proposes to add approximately 208 square miles to the HFTD and to remove approximately 168 square miles from the HFTD, resulting in a net increase of approximately 40 square miles. Appendix A, Fugere Declaration, ¶ 6.

1. SCE's Analysis Supports Adding Polygons SCE Proposes to Designate as HFTD

Consistent with the analysis supporting SCE's 2019 Petition and the criteria the Commission has previously considered when determining whether to designate areas as HFTD,[20] SCE evaluated multiple wildfire risk factors when developing its recommendations to modify certain HFTD boundaries. To develop the Report, SCE first compared the current HFTD boundaries with an updated fuel map based on recent and spatially granular data. SCE used this comparison to identify locations outside of the current HFTD boundaries containing burnable fuels—e.g., continuous vegetation in non-irrigated, non-urban areas—where wildfire risk may be elevated because of the presence of fuels, which could lead to ignitions that may spread rapidly. SCE's multi-disciplinary team of subject matter experts then performed a holistic analysis of several factors to assess wildfire risk before making recommendations to modify the HFTD Map. The Report includes the following information for each polygon:

- **A satellite-based geographic information system map**. The base layer for maps shows local structures, roads, and other images of the environment. These features help visualize egress constraints that may hinder the ability to evacuate in the event of a wildfire. The maps also show relevant environmental features, such as the presence of a body of water which may decrease the risk of a wildfire.
- **Historical fire information**. The frequency of past fires can be a meaningful indicator of potential future fires, although it does not necessarily indicate potential fire severity.
- **Location of SCE assets**. SCE has included the location of transmission assets, distribution assets, and customer meters.

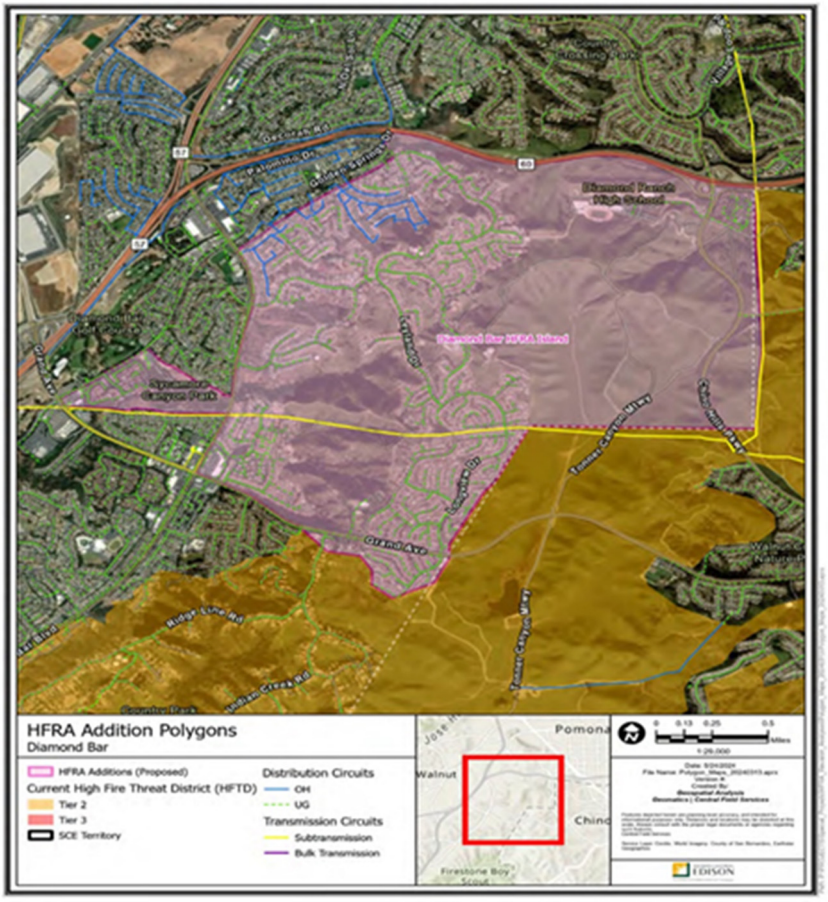
[20] *Supra*, p. 3 (citing criteria listed in D.20-12-030).

- **Silvis Labs Wildland-Urban Interface ("WUI") data**. This data highlights areas where populations and development, including buildings and other infrastructure, interfaces with undeveloped wildlands and may present elevated wildfire risk.
- **U.S. Department of Agriculture / U.S. Forest Service Wildfire Hazard Potential Index**. SCE has included information from the U.S. Forest Service's index that quantifies the relative potential for a high-intensity wildfire that may be difficult to contain, based on wildfire simulation modeling.
- **U.S. Department of Agriculture / U.S. Forest Service flame length probability data.** SCE has included information on the potential for flame lengths greater than 8 feet high in the event of a fire, which serves as an indicator of wildfire intensity.
- **Technosylva Fuels 2030 data**. This data includes detailed categorization of fuel types, such as grass, shrub, timber, and agricultural fuels, with variations in load and burnability. It also accounts for urban areas, roads, bodies of water, and other non-burnable regions.
- **Terrain slope.** The nature of local terrain may pose challenges to fire suppression efforts in the event of a wildfire. Terrain slope also influences fire behavior and spread, depending on other local factors such as wind and fuels.
- **Recommendations**. The Report provides justifications for SCE's recommendations to add or remove each polygon from the HFTD Map.

A polygon located in the city of Diamond Bar in Los Angeles County is an example of a location containing burnable vegetation that is not currently designated as HFTD. SCE initially identified the area in Figure II-1 below by comparing the existing HFTD Map with updated fuel model data. SCE then analyzed other wildfire risk factors listed above, including burnable fuels, terrain slope, proximity to WUI, fire and weather history, and natural fire breaks such as wide bodies of water. This review revealed that the polygon has elevated wildfire risk because it contains burnable fuel in complex terrain adjacent to the wildland-urban interface. Additionally, the presence of a high school with only one access road creates a potential for egress constraints

in the event of an emergency with a need to quickly evacuate the area. Given these risk factors, SCE recommends that the current HFTD boundary be extended to the area with pink shading in Figure II-1 to reflect the elevated wildfire risk.

Figure II-1
Proposed HFTD Addition



---

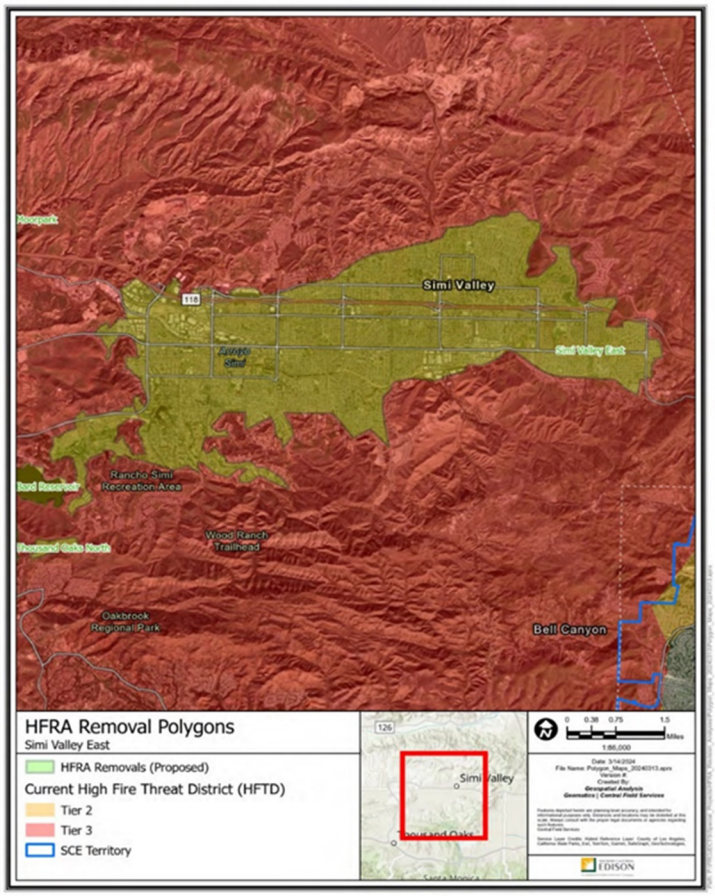
2. SCE's Analysis Supports Removing Polygons SCE Proposes to De-Designate as HFTD

Similar to the process SCE used to identify potential areas with elevated wildfire risk to add to the HFTD Map, SCE compared the current HFTD boundaries with an updated fuel map to identify areas within its service territory currently designated as HFTD which do not contain burnable fuel loads and may not warrant the HFTD designation given the relatively lower risk of

catastrophic wildfire. Areas with lower burnable fuel loads—and therefore lower wildfire risk—include locations with bodies of water, irrigated agriculture, golf courses, airports, roads, and other urban areas. SCE's proposed removals would align the HFTD boundaries with natural and man-made firebreaks. The Report in Appendix C includes the information noted above in Section II.B.1 for each polygon that SCE recommends removing from the HFTD Map.

As one example, SCE proposes to remove the suburban center of Simi Valley from the Commission's HFTD Map. Although WUI data classifies most of the area as wildland-urban interface which would typically be considered to have elevated wildfire risk, SCE determined through a review of fuel information and wildfire history that this area has limited burnable fuels and that the wildfire risk in the suburban center does not warrant the HFTD designation. Thus, as shown by the light green shading below in Figure II-2, SCE recommends the removal of the developed suburban area from the HFTD boundary while preserving the HFTD designation for the adjacent terrain.

Figure II-2
Proposed HFTD Removal



III.

REQUEST FOR RELIEF

Consistent with SCE's polygon-by-polygon analysis, this Petition requests that, as soon as reasonably practical, the Commission modify D.17-12-024 in accordance with the recommendations set forth in the Report in Appendix C. From an operational perspective, while this Petition is pending, SCE intends to begin to treat its proposed *additions* to the HFTD as eligible for Public Safety Power Shutoffs ("PSPS") as a measure of last resort when conditions present unacceptable wildfire risk. However, given the long lead times associated with operationalizing changes to the HFTD boundaries, SCE intends to implement enhanced asset

inspections and maintenance schedules, vegetation management activities, and other programs aimed at mitigating wildfire risk in the polygons that SCE proposes to be added to the HFTD only after the Commission rules on this Petition. Moreover, from an operational perspective, SCE intends to continue to treat areas that it has proposed to be *removed* from the HFTD Map as HFTD until the Commission issues its decision on this Petition.[21]

Commission Rule of Practice and Procedure 16.4(b) requires that "[a] petition for modification of a Commission decision must concisely state the justification for the requested relief and must propose specific wording to carry out all requested modifications to the decision." SCE's proposed modifications are listed in Appendix B.

Respectfully submitted,

CLAIRE E. TORCHIA
PETER SHAKRO

/s/ Peter Shakro
By: Peter Shakro

Attorneys for

SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (213) 544-8594
E-mail: Peter.Shakro@sce.com

November 8, 2024

[21] SCE will also continue its approved practice of defining a 200-foot buffer around the HFTD boundary as an additional margin for enhanced wildfire mitigation activities. *See* D.19-05-038, *Decision on Southern California Edison Company's 2019 Wildfire Mitigation Plan Pursuant to Senate Bill 901*, p. 7.

Appendix A

Declaration of Raymond Fugere in Support of SCE's Petition

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop and Adopt Fire-Threat Maps and Fire-Safety Regulations.	Rulemaking 15-05-006

DECLARATION OF RAYMOND FUGERE IN SUPPORT OF SOUTHERN CALIFORNIA EDISON COMPANY'S PETITION FOR MODIFICATION OF DECISION 17-12-024 TO UPDATE HIGH FIRE THREAT DISTRICT BOUNDARIES IN ITS SERVICE TERRITORY

I, Raymond Fugere, declare as follows:

1. I am the Director of Asset and System Intelligence in Southern California Edison Company's ("SCE") System Planning & Engineering ("SP&E") business unit. In my role, I report directly to SP&E Senior Vice President Shinjini Menon.
2. I had overall management responsibility for the commissioning and oversight of the evaluation that led to the polygon-by-polygon analysis and report attached as Appendix C ("Report") to SCE's Petition for Modification of Decision 17-12-024 to Update High Fire Threat District Boundaries In Its Service Territory ("PFM").
3. Over the past two years, a team under my direction consisting of SCE employees with subject matter expertise in fire management and response, fire behavior, fuels, meteorology, grid operations, risk management, wildfire operations, and geospatial analysis conducted a thorough evaluation to compare the current wildfire risk in of SCE's service area with the current HFTD boundaries. This team compared the current HFTD boundaries with an updated fuel map. It identified places within SCE's service area that are currently designated as HFTD which do not contain burnable fuel loads and do not warrant the HFTD designation

given the relatively lower risk of a catastrophic wildfire at the locations described in the Report. This team also analyzed locations outside of the current HFTD boundaries containing burnable fuels where wildfire risk is elevated and should be designated as HFTD.

4. The Report is the result of extensive analysis, encompassing hundreds of hours spent reviewing multiple data sources, assessing local conditions in each polygon, conducting field surveys, holding meetings and discussions, and vetting recommendations with senior executives and other key stakeholders.
5. Each polygon described in the Report was evaluated using a variety of criteria, including geographic information system maps, historical fire information, location of SCE assets, Silvis Labs Wildland-Urban Interface data, information from the U.S. Forest Service Wildfire Hazard Potential Index, U.S. Forest Service flame length probability data, Technosylva Fuels data, and local terrain information. SCE made its polygon-specific recommendations on a case-by-case basis through a holistic analysis of these criteria.
6. As described in detail in the Report, SCE seeks to update the HFTD Map to include 47 additional polygons and to remove 61 polygons. If the Commission agrees with SCE's recommendations, SCE's proposed modifications would add approximately 40 square miles to the HFTD, representing a modest 0.07% net increase of HFTD areas within SCE's service area.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 8th day of November 2024 in Sherman Oaks, California.

/s/ *Raymond Fugere*

Raymond Fugere

Appendix B

SCE's Proposed Modifications to Findings of Fact and Conclusions of Law

SCE's Proposed Modifications to Findings of Fact and Conclusions of Law in D.17-12-024

Proposed text additions are in bold and underlined (**abcd**)

Reference	Proposed Modification
Proposed New Finding of Fact 8(a)	**On November 8, 2024, Southern California Edison Company ("SCE") submitted a Petition for Modification ("SCE's 2024 Petition") of D.17-12-024 to recommend modifications to certain HFTD boundaries in SCE's service area. Appendix C to SCE's 2024 Petition constitutes a granular and detailed, risk-based analysis to support its proposed modifications.**
Proposed New Conclusion of Law 10(a)	**SCE's 2024 Petition to update certain HFTD boundaries is granted. The HFTD Map shall be amended to reflect the recommendations identified in Appendix C to SCE's 2024 Petition.**
Proposed New Ordering Paragraph 13	**Southern California Edison Company's 2024 Petition is hereby granted. The High-Fire Threat District Map is hereby amended to reflect the recommendations identified in Appendix C of SCE's 2024 Petition.**

Appendix C

SCE's Proposed Modifications to HFTD Boundaries

In accordance with SCE's Notice of Availability of Appendices in Support of Its Petition for Modification of Decision 17-12-024 to Update High Fire Threat District Boundaries in Its Service Territory, Appendix C is available at https://www.sce.com/safety/wild-fire-mitigation.

Appendix D

Tabular Data Supporting SCE's Petition

In accordance with SCE's Notice of Availability of Appendices in Support of Its Petition for Modification of Decision 17-12-024 to Update High Fire Threat District Boundaries in Its Service Territory, Appendix D is available at https://www.sce.com/safety/wild-fire-mitigation.

Appendix E

Spatial Data Supporting SCE's Petition

In accordance with SCE's Notice of Availability of Appendices in Support of Its Petition for Modification of Decision 17-12-024 to Update High Fire Threat District Boundaries in Its Service Territory, Appendix E is available at https://www.sce.com/safety/wild-fire-mitigation.