Application No.: Exhibit No.: Witnesses:

A.22-06-003		
SCE-01 E-2		
K. Borngrebe	V. Hernandez	
D. Daigler	M. Jocelyn	
R. Fugere	M. Peacore	
K. Gardner	E. Pulgar	
J. Gooding	E. Torres	
J. Gurrola	V. Trehan	
A. Hardy	A. Watson	



(U 338-E)

Direct Testimony in Support of Southern
California Edison Company's Application for
Authorization to Recover 2021 Incremental
Costs Related to Wildfire Mitigation and
Vegetation Management

SECOND ERRATA

Before the

Public Utilities Commission of the State of California

1 Blow-In, and Fall-In events. 2

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include confirmed tree-related events (TCCI) by SCE field verification, and are categorized as Grow-In,

Table III-29 Average Events Pre & Post Clearances 58

Average Events Pre & Post Enhanced Clearances

Average Events Pre and Post Enhanced Clearances	Pre-Enhanced Clearances 2015-2019 Avg TCCIs per Year	Post Enhanced Clearances 2020-2021 Avg TCCIs per Year	Difference
HFTD	148.4	61.5	-59%
Non-HFTD	289.2	136	-53%
All	437.6	197.5	-55%

2. 2021 Scope and Cost of Work Performed

In 2021, SCE recorded \$363.7 million in costs related to Routine Vegetation

Management. These costs were reasonable based on the many factors that can affect the overall cost of Routine Vegetation Management work in a given year. Below, SCE describes the various factors that drove the costs incurred in 2021, and adjustments SCE made to safely execute its vegetation management work. For example:

- 2021 recorded costs reflect the higher cost of vegetation trimming and removals due to higher contract labor rates, including but not limited to the impact of SB 247 on contract re-negotiations.
- 2021 was the first full calendar year to reflect the cost of SCE's newer wildfire mitigation activities, such as the full deployment of the Areas of Concern supplemental patrols program.
- In 2021, SCE engaged in **new and expanded activities** that were integral to daily vegetation field operations, such as customer notifications, increased traffic control, and obtaining environmental approval for a greater number of work points.

For a more detailed discussion, please see SCE 2022 WMP, p. 700. SCE acknowledges that there were multiple on-going programs, such as the WCCP and the HTMP, that also may have contributed to the reduction of TCCIs.