

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

Application of Southern California Edison Company (U338E) for Authority to Increase its Authorized Revenues for Electric Service in 2021, among other things, and to Reflect that Increase in Rates.

Application 19-08-013  
(Filed August 30, 2019)

**MOTION OF THE UTILITY REFORM NETWORK  
FOR ADMISSION OF EXHIBIT**



Katy Morsony, Staff Attorney  
The Utility Reform Network  
785 Market Street, Suite 1400  
San Francisco, CA 94103  
(415) 929-8876 (office)  
(415) 929-1132 (fax)  
[bfinkelstein@turn.org](mailto:bfinkelstein@turn.org)  
[kmorsony@turn.org](mailto:kmorsony@turn.org)

August 7, 2020

**MOTION OF THE UTILITY REFORM NETWORK  
ADMISSION OF EXHIBIT**

Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure, The Utility Reform Network (TURN) respectfully moves for a ruling admitting into the evidentiary record the previously identified exhibit TURN-78, which is attached to this motion. TURN-78 consists of the SCE response to Data Request TURN-SCE-117.

On July 21, 2020, SCE served SCE-15 Volume 5E3, Errata to Southern California Edison Company's General Rate Case, after the time for cross-examination of the sponsoring witness had passed. This Errata made clarifications related to Figure II-3 in SCE rebuttal testimony. Following this Errata, TURN propounded discovery on SCE related to the changes. Before the close of hearings on July 22, 2020, TURN, with SCE's assent, reserved exhibit number TURN-78 to submit an additional exhibit containing discovery answering TURN's questions regarding the Errata. The response to TURN-SCE-117 addresses TURN's questions related to the Errata and TURN seeks to admit it to the record as TURN-78.

TURN moves for the admission of TURN-78. SCE has indicated it does not object to TURN's request to admit TURN-78 to the record. As the errata and resulting discovery relates to SCE's rebuttal of TURN's testimony, TURN expects this motion will be otherwise unopposed. and respectfully requests it be granted expeditiously, as permitted under Rule 11.1(g).

Dated: August 7, 2020

Respectfully submitted,

By: \_\_\_\_\_ /s/ \_\_\_\_\_  
Katy Morsony

Katy Morsony, Staff Attorney  
**THE UTILITY REFORM NETWORK**  
785 Market Street, Ste. 1400  
San Francisco, CA 94103  
(415) 929-8876 x313  
[kmorsony@turn.org](mailto:kmorsony@turn.org)



**Southern California Edison Company 2021 GRC**

**A. 19-08-013**

**TURN HEARING EXHIBIT**

**TURN-78**

Data Response TURN-SCE-117

*Southern California Edison*  
*A.19-08-013 – SCE 2021 General Rate Case*

**DATA REQUEST SET T U R N - S C E - 1 1 7**

**To: TURN**  
**Prepared by: Eric X Wang**  
**Job Title: Prdctve Anlytcs/Data Science, Sr Advisor**  
**Received Date: 7/22/2020**

**Response Date: 7/28/2020**

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**Question 01.a-b:**

The following relates to SCE-15, Volume 5E3, Errata to SCE’s Wildfire Management Rebuttal Testimony.

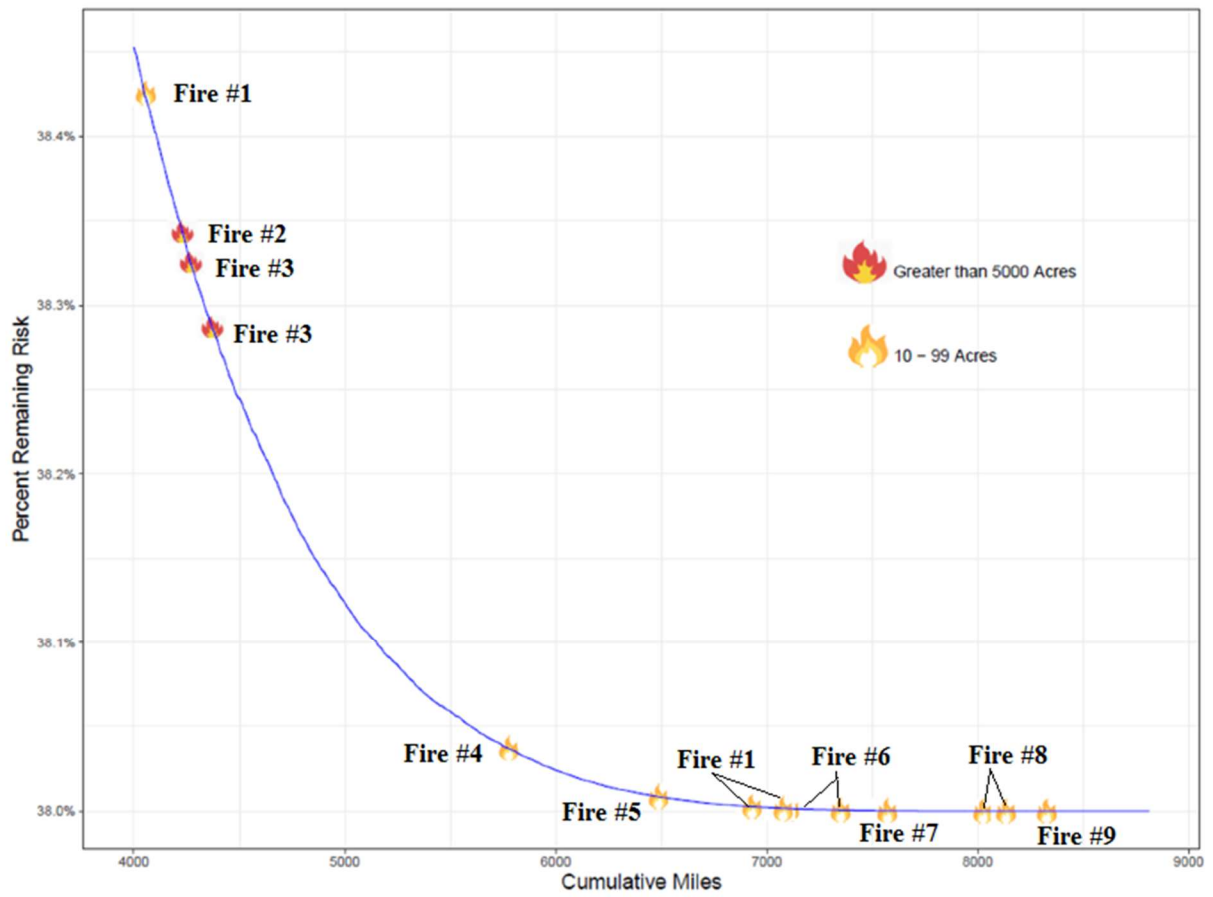
On A331E SCE explains that in Figure II-3, certain fires that may impact more than one circuit will result in multiple fire icons.

- a. Please provide the workpapers that underlies this Figure and explaining the data associated with each fire icon represented on this figure.
- b. Please provide this Figure clarifying where multiple fire icons represent the same fire.

**Response to Question 01.a-b:**

- a. Please see Excel file “TURN\_SCE\_117.xlsx” for conductor segments that are associated to the structures reported in the CPUC-reportable fires.
- b. Please see the figure below with fire IDs corresponding to the “FIRE DUMMY ID” column in Excel file “TURN\_SCE\_117.xlsx”. Columns “Cumulative\_Miles” and “Pct\_Remaining\_Risk” in Excel file “TURN\_SCE\_117.xlsx” correspond to the X axis and Y axis in Figure II-3 respectively.

**Figure II-3**  
**Overlay of Historical Large Fire Events**  
**on SCE's Relative Risk Buydown Curve**



**SCE Response to TURN-117 Attachment:  
TURN\_SCE\_117.xlsx**

Conductor_ID	CIRCUIT_NAME	Cumulative_Miles	Pct_Remaining_Risk	Voltage	FLOC	Fire Size	Year	Date	FIRE DUMMY ID
36824964	TICO	4048.351175	0.384256608	16 kV	OH-1604151E	10 - 99 Acres	2016	4/28/16	1
18705371	BIRCHIM	4229.462134	0.383435588	12kV	OH-1854107E	Greater than 5000 Acres	2015	2/6/15	2
16558907	CACHUMA	4267.145478	0.383256327	16 kV	OH-1413051E	Greater than 5000 Acres	2016	8/18/16	3
16557976	CACHUMA	4369.662896	0.382872335	16 kV	OH-1413051E	Greater than 5000 Acres	2016	8/18/16	3
182993315	SKINKLE	5769.808927	0.380373759	12 kV	OH-4566417E	10 - 99 Acres	2016	5/29/16	4
27859459	SKINKLE	5769.841346	0.380373715	12 kV	OH-4566417E	10 - 99 Acres	2016	5/29/16	4
27906029	SKINKLE	5770.049259	0.380373671	12 kV	OH-4566417E	10 - 99 Acres	2016	5/29/16	4
35308616	MAYER	6480.034452	0.380086244	33 kV	OH-2225121E	10 - 99 Acres	2018	4/28/18	5
36823609	TICO	6919.036795	0.380026304	16 kV	OH-1604151E	10 - 99 Acres	2016	4/28/16	1
25429418	SEXTON	7040.252958	0.380018439	16kV	OH-1718768E	10 - 99 Acres	2015	2/22/15	6
170890521	TICO	7067.434163	0.380016635	16 kV	OH-1604151E	10 - 99 Acres	2016	4/28/16	1
142479526	SEXTON	7095.890423	0.380015085	16kV	OH-1718768E	10 - 99 Acres	2015	2/22/15	6
25431397	SEXTON	7340.79492	0.380006214	16kV	OH-1718768E	10 - 99 Acres	2015	2/22/15	6
12141986	MIST	7563.314774	0.38000209	16 kV	OH-4538468E	10 - 99 Acres	2016	8/24/16	7
104715471	ACRES	8018.602278	0.380000098	12kv	OH-1873216E	10 - 99 Acres	2015	7/3/15	8
25262034	ACRES	8128.178603	0.38000004	12kv	OH-1873216E	10 - 99 Acres	2015	7/3/15	8
61681307	HI LINE	8305.132255	0.380000006	12kV	OH-1492845E	10 - 99 Acres	2014	6/23/14	9
61681128	HI LINE	8318.313543	0.380000005	12kV	OH-1492845E	10 - 99 Acres	2014	6/23/14	9