

**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 338-3) SUPPLEMENTAL
INFORMATION REGARDING ITS PETITION TO MODIFY DECISION 17-12-024**

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Dated: **August 10, 2020**

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I.

INTRODUCTION

In response to Administrative Law Judge Valerie Kao's July 27, 2020 email ruling, Southern California Edison Company (SCE) respectfully submits this supplemental information regarding its August 19, 2019 Petition to Modify Decision (D.)17-12-024.

1. **Provide a Complete ArcGIS Shapefile and Geodatabase of all the Submitted Change Polygons, with Clear Index Attribution to Cross-Refence. At minimum, for each Polygon, Provide:**

- a. **Polygon identification number**

Polygon shapes were created and informed by data points such as the SCE districts and associated Zip Codes. Each polygon was given a unique number for identification, and polygons that may have been subdivided during the evaluation kept their parent number followed by an alpha character. The polygon numbers are included in the geodatabase entitled "Retained_NonCPUC_HFRA.gdb" and supporting documentation included with this

submission. Also, SCE has included an Excel file entitled “Geodatabase data” that includes the polygon layer attributes and associated information.

b. Maximum risk score according to the simulation described in SCE’s petition to modify D.17-12-024.

The maximum Reax risk score is included in the geodatabase and in the supporting Excel file entitled “Reax Data Simulations” included with this submission.

c. Number of samples (i.e., number of simulation results within the polygon)

The number of simulation results per polygon are included in the geodatabase. The number of samples vary based on the size of the polygon and quantity of overhead structures located within that polygon.

d. SCE overhead distribution lines

The number of SCE overhead distribution circuit miles are included in the geodatabase by polygon.

e. SCE underground distribution circuit miles

The number of SCE underground distribution circuit miles is included in the geodatabase by polygon.

f. SCE overhead subtransmission circuit miles

The number of SCE overhead subtransmission circuit miles is included in the geodatabase by polygon.

g. SCE underground subtransmission circuit miles

The number of SCE underground subtransmission circuit miles is included in the geodatabase by polygon.

h. SCE overhead transmission circuit miles

The number of SCE overhead transmission circuit miles are included in the geodatabase by polygon.

i. SCE underground transmission circuit miles

The number of SCE underground transmission circuit miles are included in the geodatabase by polygon.

j. Number of previous ignitions

The CPUC-reportable utility-associated ignitions from 2015-2020 are included in the geodatabase for the recommended polygons. Please note that the 2020 data contains events that are still under Engineering review and may not ultimately be ruled to be an actual ignition.

k. Number of tree trims performed from 1/1/2018 to 12/31/2018

2018 tree trims and removals have been provided in the geodatabase.

l. Number of tree trims performed from 1/1/2019 to 12/31/2019

2019 tree trims and removals have been provided in the geodatabase where the data is available. Certain information is not available due to data system limitations issues.

m. Number of dead trees identified within the polygon

Drought Relief Initiative (DRI) and Bark Beetle program data for dead trees is provided in this submission. SCE is also providing data from the Hazard Tree Management Program (HTMP), which includes numbers of dead, dying, and diseased trees (although not exclusively).

2. **Provide a Comprehensive Description of the Inputs and Assumptions Used for the Monte Carlo-based Modeling Described in SCE's Petition to Modify D.17-12-024.**

A 20-year (1999-2018) fire weather climatology was developed using the Weather Research and Forecasting (WRF) model to recreate historical days of fire-weather significance across SCE's service territory. Although 900 days were included in this climatology, the data set was distilled to the most severe 40 days for a given location within SCE's service territory. High-resolution (2 km) hourly gridded fields of relative humidity, temperature, dead fuel moisture, and wind speed/direction were extracted from this analysis and provided as inputs to a Monte Carlo-based fire modeling analysis. The spatial extent of this fire modeling analysis was limited to the CPUC High Fire Threat District (HFTD), SCE's non-CPUC High Fire Risk Areas (HFRA) (known internally as Bulletin 322 areas, or "BL322," in reference to System Operating Bulletin 322 governing the operation of overhead lines in High Fire Risk Areas), and an additional one-half mile buffer around these areas. In this fire modeling analysis, hundreds of thousands of ignition locations were distributed randomly within a 100-meter buffer surrounding SCE's overhead facilities. For each ignition location, one of the days from fire weather climatology described above was also selected randomly. For each combination of ignition location and time of ignition, fire progression was modeled for six hours. For each modeled fire, potential impacts to structures were quantified using structure density data from the 2010 Census. Fire area and fire volume (spatial integral of fire area and flame length) were also tabulated and recorded. This process was repeated across SCE's service territory for hundreds of thousands of combinations of ignition locations and times of ignition.

Outputs from the Monte Carlo fire modeling analysis were post-processed to quantify risk as the product of probability and consequence. Fire volume was used as a proxy for probability because rapidly spreading fires are more likely to escape initial containment efforts than slowly developing fires. Consequence (or impact) is quantified as the number of structures within a modeled fire perimeter. To limit the order of magnitude of risk scores to $\sim 10^4$, risk was

calculated as $0.001 \times \text{fire volume} \times \text{impacted structures}$. Geospatial outputs from this analysis were delivered via GeoTiff raster files.

3. Provide the Actual Risk Scores from all Simulations Run for Each Polygon, as Described in SCE's Petition to Modify D.17-12-024. SCE Shall Submit an Excel or other spreadsheet-based File Containing this Information to the Assigned Administrative Law Judge.

The Reax Data Simulations spreadsheet contains a list of all Reax simulations (with their resulting scores) within the recommended polygons. Reax Engineering provided SCE with four unique raster files containing the fire simulation data at a 30-meter resolution. This resolution represents each individual simulation. These 30-meter resolution Reax files were converted from a raster format into individual points, with each point centered in the middle of each 30-meter square. The points were then consolidated into a single geospatial database representing all of the fire simulations conducted for SCE's service territory. Polygons were then intersected with these Reax points to create a relationship between the two sets of records.

4. For any Polygon in SCE's Petition that Overlaps an Area Originally Submitted for Consideration in the Map 2 Development Process and was, Either in Part or Wholly Rejected by the Independent Review Team (IRT), Provide (1) a Summary of the Justification Provided by the IRT for Rejection; and (2) a Justification for Resubmittal in the Petition to Modify D.17-12-024.

SCE reviewed the CPUC FireMap website (<http://cpuc.firemap2.sig-gis.com/>), extracted the geospatial files associated with previous SCE ticket submissions regarding TL map change proposals, compared those geospatial files with the current proposed polygon geospatial files and identified six polygons (Unique ID label #s 161, 187, 314, 785, 841, and 1043) that have overlapping areas. SCE was not able to identify any associated documentation of the six referenced polygons with intersecting areas from previous submissions stating whether those

areas were accepted or denied. SCE has provided justifications for inclusion of each polygon in the geodatabase.

5. **Provide any Additional Fire Potential Metrics Related to Fire Weather, Ignition Potential, Fire Spread/Fire Size and Fire Impacts for Each Polygon, as Available Due to New Hazard and Risk Modeling Done for SCE’s 2020 Wildfire Mitigation Plan, as Summarized for the Area of the Proposed Change Polygon.**

SCE has included 2015-2020 wire down data for each of the polygons in the geodatabase.

6. **Provide a Point of Contact Person to Act as the “Territory Lead” as Functional in the Map 2 Development Process, Which Will Facilitate Direct Communication to SCE Representatives.**

The SCE territory lead will be:
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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) SUPPLEMENTAL INFORMATION REGARDING ITS PETITION TO MODIFY DECISION 17-12-024** on all parties identified on the attached service list for **R.15-05-006**. Service was effected by one or more means indicated below:

- Transmitting the copies via e-mail to all parties who have provided an e-mail address.
- Causing copies to be placed in sealed envelopes with such envelopes to be delivered via United States mail with first-class postage prepaid to the offices of the Assigned ALJ or other addressee(s).

**ALJ Timothy Kenney
ALJ Valerie Kao
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102**

Executed this **August 10, 2020**, at Rosemead, California.

/s/ Edith Leon _____

Edith Leon

Legal Administrative Assistant

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California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION

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FILER: CPUC

LIST NAME: LIST

LAST CHANGED: AUGUST 5, 2020

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