

Application No.: A.19-08-013
Exhibit No.: SCE-15 Vol. 05 **E** ~~2~~ 3
Witnesses: D. Daigler
~~B. Fielder~~
R. Fugere
K. Gardner
R. Roy
A. Swisher



(U 338-E)

**2021 General Rate Case
Rebuttal Testimony**

ERRATA ~~2~~ 3

Wildfire Management

Before the

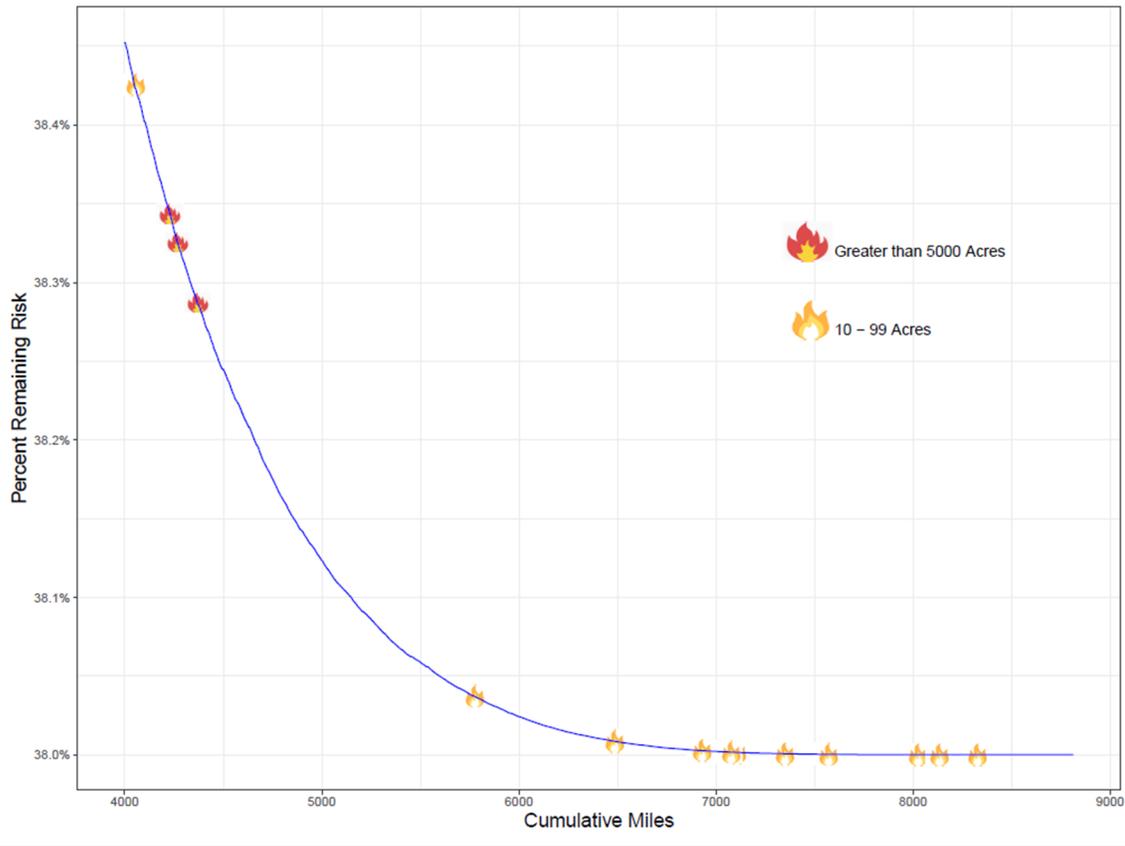
Public Utilities Commission of the State of California

Rosemead, California
June 12, 2020

1 public safety risk associated with wildfires. TURN’s proposal would leave significant parts of the
2 system completely uncovered, including locations where large fires have occurred in recent years.

3 To illustrate this, SCE has overlaid large historical reportable ignitions
4 which have occurred since 2014 on the updated risk curve presented previously. As can be seen in
5 Figure II-3 below, there have been ~~three~~ ^{two} recent ignitions greater than 5,000 acres which occurred up to
6 the 4,500 mile-mark. In other words, while the relative modeled risk reduction does decrease beyond
7 2,500 miles, there is substantial risk – not just modeled risk – proven to have occurred beyond 2,500
8 miles. See Appendix p. A331E for an explanation of how a single ignition can be associated with multiple
circuit segments.

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



9 SCE has presented a solution – its WCCP program – to dramatically
10 reduce the potential for ignitions that have the potential to lead to catastrophic wildfires. It is clear from
11 this figure that TURN’s proposal could prove to be insufficient in preventing ignitions from occurring
12 and turning into large wildfires of the same size and scale that California has seen in recent years.

Index

Document	Page Number(s)
SCE-PubAdv-003 Q1	A290-A291
PubAdv-SCE-073 Q1b.1-6	A292-A296
Workpaper – WPSCE04Vol05Pt02, pp. 66-77	A297-A308
Exhibit SCE-04, Vol. 05AE, Amended Testimony on Wildfire Management Errata	A309-A315
Exhibit WPSCE04Vol05APt01E	A316-A330
Explanation of How an Ignition Can Be Associated with Multiple Circuit Segments	A331E

Explanation of How an Ignition Can Be Associated with Multiple Circuit Segments

SCE's relative risk buydown curve or Figure II-3 on page 25 maps historical CPUC reportable fires that are either 10-99 acres or greater than 5,000 acres. Each CPUC reportable fire is mapped to a single structure. However, each structure in SCE's service territory can be connected to multiple circuit segments. This can result in one fire being associated to multiple circuit segments. The underlying data for Figure II-3 has nine unique fires, however, Figure II-3 depicts fire icons for all the circuit segments associated with those nine fires. Although these circuit segments may be physically next to each other, they will have different wildfire risk scores and therefore appear on different points along Figure II-3. While the wildfire risk scores result in distinct points along the risk curve, due to the scale of the plot, segments with similar risk scores may appear as one fire icon on the curve in Figure II-3.