

Application No.: A.19-08-013

Exhibit No.: SCE-100

Witnesses: T. Godfrey



SOUTHERN CALIFORNIA  
**EDISON**<sup>®</sup>

An *EDISON INTERNATIONAL*<sup>®</sup> Company

(U 338-E)

***SCE-PubAdv-010-MC Revised Answer***

Before the

**Public Utilities Commission of the State of California**

Rosemead, California

**PUBLIC ADVOCATES OFFICE  
DATA RESPONSE  
Southern California Edison Company Test Year 2021 General Rate Case  
A.19-08-013**

**Date:** 22 July 2020

**Origination Date:** 21 July 2020

**Response Due:** **22 July 2020**

**To:** Martin Collette, [Martin.collette@sce.com](mailto:Martin.collette@sce.com)

cc: [Douglas.Snow@sce.com](mailto:Douglas.Snow@sce.com)  
[Russell.Archer@sce.com](mailto:Russell.Archer@sce.com)  
[scegrc@sce.com](mailto:scegrc@sce.com)

**From:** Truman Burns, Project Coordinator  
Public Advocates Office  
505 Van Ness Avenue, Room 4104  
San Francisco, CA 94102 [txb@cpuc.ca.gov](mailto:txb@cpuc.ca.gov)

**Response by:** Tamera Godfrey  
**Phone:** 415-703-1367  
**Email:** [tamera.godfrey@cpuc.ca.gov](mailto:tamera.godfrey@cpuc.ca.gov)

**Data Request No:** SCE-PubAdv-010-MC (Revised)

**SCE Questions:**

1. At page 64 of PAO, Cal Advocate state “The Public Advocates Office removed the following sub-activities from its Wildfire Management TY recommendation: EOI Inspections – Distribution of \$9.626 million, EOI Repairs – Transmission of \$6.648 million, and EOI – Repairs of \$14.554 million”. The remainder of the testimony discusses Distribution Overhead Inspections and Distribution Preventive and Breakdown Maintenance expenses, but does not mention EOI Repairs- Transmission..
  - a. Please identify which sections of the testimony provide an explanation and basis for Cal Advocates proposal to remove the EOI Repairs – Transmission sub-activity. If there is no explanation included in Cal Advocates testimony for setting test year funding for the EOI Repairs – Transmission sub-activity at zero, please explain the omission. If some material was inadvertently left out, please provide the missing testimony.
  - b. Is it Cal Advocates position that Transmission repairs for EOI are identified through Distribution Inspections? If the answer is no, please explain where Cal Advocates believe how Transmission Repairs are identified.
  - c. At page 67 of PAO-6 in discussing EOI, Cal Advocates state that it “also considers

SCE's TY forecasts in other areas of its T&D organization for the same proposed TY activities,".lis it Cal Advocates assertion that SCE has requested funding in other parts of its GRC request to perform repairs on the Transmission system resulting from EOI? If so, please state which activity within SCE's request Cal Advocates is referring to.

2. Regarding the statement on POA-6, page 63, lines 21-24 "SCE's rates also include costs for its Program Management Office that was created in 2018 that can be reallocated or activities consolidated, this program provides "oversight for all wildfire mitigation activities." Please provide what specific costs that can be reallocated with all additional analysis supporting Cal Advocates' position.
3. Regarding the statement on POA-6, page 63, lines 19-20 "SCE's rates include costs incurred for IT projects that have been completed, closed or eliminated...". Please provide what specific projects that Cal Advocates is referring to for completed projects, closed projects, and eliminated projects. Please also identify the years the projects were completed, closed, or eliminated.
4. Prior to filing the testimony on Enhanced Overhead Inspections, did Cal Advocates review Advice Letter 4031-E (cited at page 56, SCE-04, Vol. 5A)?
  - a. If the answer is yes, please explain how this informed the conclusion Cal Advocate draws at pages 64-65 of PAO-6 that "SCE's historical expense (2014-2018) for its Distribution Preventive and Breakdown O&M Maintenance and its Distribution Overhead Detailed Inspections organizations have cost embedded in rates for performing the same inspection and maintenance activities as proposed by SCE's newly organized Wildfire Management Program".
  - b. If the answer is no. please explain why Cal Advocates determined that the material in Advice Letter 4031-E was not pertinent to the analysis they were conducting in review of SCE's EOI proposals. In your response, please specifically confirm whether or not Ms. Godfrey reviewed AL 4031-E prior to submitting PAO-06.

#### **Public Advocates Office Response:**

##### **Q.1.a-c**

As discussed on page 27 of Exhibit PAO-6, the Public Advocates Office mentions that SCE's Transmission Grid is responsible for "performing annual patrols, planned and unplanned inspections and maintenance on overhead and underground transmission lines, insulator washing, road and rights-of-way maintenance and maintenance on its telecommunication network." On page 28, the Public Advocates Office mentions the activities included in SCE's TY forecast and its recommendation of \$29.169 million.

SCE's sub-activities for Transmission Line Patrols and Transmission O&M Maintenance include recorded expenses and forecasts for activities associated with Enhanced Overhead Inspections (EOI). In SCE's data response to PubAdv-SCE-073-TLG, Q.1.e.2.a, it provided costs incurred for Transmission and Distribution inspections and repairs during 2014-2018 for EOI. Note that this data request is also mentioned in footnote 170 on page 65 in Exhibit PAO-6. In footnote 165 on page 64 of Exhibit PAO-6, the Public Advocates Office mentions that SCE's Transmission Line Patrols and its Transmission O&M Maintenance TY forecasts include the same activities as proposed by SCE's Wildfire Management Program.

##### **Q.2.**

The Public Advocates Office is unable to "provide what specific costs that can be reallocated" because SCE did not provide this type of detailed information for review and analysis and states it

“has not been SCE’s typical practice to trace funds that it re-allocated” (SCE’s data response to PubAdv-SCE-070-TLG, Q.1.d.1.3.).

Q.3.

The projects that the Public Advocates Office was “referring to for completed projects, closed projects, and eliminated projects” and the “years the projects were completed, closed, or eliminated” are associated with Information Technology projects for revisions, upgrades and enhancements SCE requested funding for in its 2012, 2015 and 2018 GRCs and have costs embedded in rates (i.e., Distribution Control Management System/Distribution Management System, Business Process and Technology Integration, Information Technology and Business Integration, Market Redesign and Technology Upgrade).

As stated on page 63 of Exhibit PAO-6, SCE’s EOI Program Management Office TY forecast includes Information Technology (IT) projects with lump sum numbers that lack a detailed breakdown of the calculation of the individual line item estimates.

Q.4.a-b.

Prior to serving the Public Advocates Office’s Exhibit PAO-6, on SCE’s Wildfire Management TY O&M expense forecast, including TY proposals and forecasts associated with Enhanced Overhead Inspections, the following information, “pertinent to the analysis” was reviewed and analyzed: SCE-04, Vol. 5 – Wildfire Management, SCE-02, Vol. 6A – Vegetation Management, SCE-02, Vol. 2A – Transmission Grid, SCE-02, Vol. 1, Part 2 – Capital-Related Expense, and SCE’s data request responses to PubAdv-SCE-066-TLG, PubAdv-SCE-069-TLG, PubAdv-SCE-070-TLG, PubAdv-SCE-073-TLG, PubAdv-SCE-078-TLG, and PubAdv-SCE-081-TLG. Also see response to Q.1.a-c.

The Public Advocates Office’s Exhibit PAO-6 did not make a determination that “the material in Advice Letter 4031-E was not pertinent to the analysis they were conducting in review of SCE’s EOI proposals.” Ms. Godfrey did not review the Advice Letter prior to the submission of her testimony, but not because she thought it was ‘not pertinent.’” In writing her testimony and making her recommendation for Edison’s EOI proposals, she reviewed and analyzed the various documents she listed under the earlier part of her Data Request Response to 4.a-b.

**END OF RESPONSE**

---