

September 16, 2021

Marybel Batjer
President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: August 2021 Public Safety Power Shutoff Public Briefings

Dear President Batjer:

I received the letter you sent on August 31, 2021, requesting additional information after SCE's August 3, 2021 PSPS briefing. SCE appreciates learning that the Commission found SCE's and the other large investor-owned utilities' (IOUs) presentations on our preparations for the 2021 wildfire season to be informative. SCE agrees with your letter's reminder of the seriousness and impact that PSPS, while necessary for public safety, can have on the public, especially those customers with access and functional needs. SCE has prepared extensively for the 2021 wildfire season and our responses below supplement our public briefing and PSPS Action Plan biweekly updates to demonstrate our improvements and preparedness. SCE understands that we will not be evaluated simply on the basis of the actions we have taken. We are confident that you will see the results of these actions this fall. Continuous improvement is a core company value, and you have our commitment that we will execute any PSPS events that may be necessary in 2021 better than we did in 2020. SCE will continue to listen to our customers, our state agency partners, and communities, keep engaging, and keep using feedback to improve. Below, SCE responds to the questions posed in your letter.

Responses to Questions:

PSPS Decision:

Question 1: An update on how climate change, grid hardening (covered conductor and undergrounding) and vegetation management factor into your company's risk model.

Response:

SCE uses its Wildfire Risk Reduction Model (WRRM) to inform grid hardening activities. The WRRM is comprised of two components: a Probability of Ignition (POI) component and a consequence component. The POI component is comprised of a series of machine learning models designed to estimate the baseline (pre-mitigation) probability of ignition at a location on SCE's overhead electrical system within High Fire Risk Areas (HFRA). Once a mitigation (*e.g.*, covered conductor, undergrounding, or enhanced vegetation management) has been deployed to a location, the POI component re-estimates the post-mitigation POI based on the effectiveness of each individual mitigation in targeting ignition drivers.

The consequence component is designed to estimate the consequences if an ignition were to occur at a location. This component simulates the potential spread of a fire over geographic areas for ignitions in proximity to overhead assets. These simulations result in an estimate of the potential natural unit consequences (*i.e.*, structures, acres, and population) if an ignition were to occur under specific weather conditions (*e.g.*, temperature, humidity, wind, fuel loading). These simulations are based on a catalog of 444 extreme fire weather scenarios representative of climate change to date and are simulated based on fuel conditions projected out 10 years to account for fuel regrowth in recently burned areas. SCE will continue to augment our understanding of how climate change could influence wildfire risk under forward looking scenarios.

For more details on SCE's WRRM, please refer 2021 WMP update.¹

Question 2: With the increased implementation of grid hardening and vegetation management to date, what is your estimated number of PSPS events and average and maximum event duration in 2021?

Response:

Predicting the number of future PSPS events and their duration is an extremely difficult task. Two major factors make forecasting this fall fire season complex. The first is the likely return of the La Niña weather pattern, which current models suggest may cause an above normal number of days having Santa Ana wind conditions. The second factor making predictions difficult is the timing of the onset of winter precipitation. Some long-range models suggest that the Sierra may experience rain and snow earlier in the season with some precipitation as far south as Southern California by October or early November. While chances of this scenario occurring are probably less than 50%, it could potentially reduce some of the fall fire potential.

Aside from factors specific to this season, the complexities and unpredictability of year-to-year weather are demonstrated by SCE's past two PSPS seasons, which were quite different in timing and intensity. While fuel conditions must be dry enough to elevate fire potential, events are driven by localized strong winds that can be difficult to forecast more than a few days to a week in advance.

Despite these challenges, SCE forecasted event counts and durations for 2021 in its 2021 Wildfire Mitigation Plan (WMP) update, Table 11. The table forecasts one to three events in Q3 of 2021 and three to eleven events in Q4. SCE forecasted the estimated duration for Q3 events to range between 1,129 and 3,622 customer hours, and Q4 events between 1,213,366 and 3,893,102 customer hours. SCE used 2020 recorded data adjusted for expected improvement from SCE's planned wildfire mitigation activities to create a baseline. To factor in weather variability, which significantly impacts PSPS events, SCE developed a range around the baseline. The range is based on an 18-year backcast analysis of historical weather data that would have necessitated PSPS events using current wind and Fire Potential Index (FPI) thresholds. For further details on how SCE calculated this range, please see SCE's 2021 WMP, section 8.5.

¹ SCE's 2020 and 2021 WMPs are available at: <https://www.sce.com/safety/wild-fire-mitigation>.

SCE also performed reduction forecasts for 2021 using 2020 as a backcasting measure. As explained in SCE's 2021 WMP update, in 2021 SCE expects to reduce the number of customers affected by PSPS de-energizations in 2020 by at least 30 percent, based on the PSPS protocol improvements and grid hardening completed since last year and assuming the same weather and fuel conditions as in 2020. These improvements would also reduce the number of circuit de-energizations due to PSPS in 2021 by at least 25 percent over 2020, and reduce the total customer minutes of interruption (CMI) by more than 50 percent over 2020, assuming the same weather and fuel conditions. In theory, these reductions would yield more than 41,000 customers removed from scope, more than 100 fewer circuit de-energizations and more than 135 million fewer customer minutes of interruption.

Question 3: What changes in the threshold framework under which you will consider calling a PSPS event have been made from last year to this year, if any?

Response:

Previously, SCE set the activation threshold at the Fire Potential Index (FPI) value of 12 for all Fire Climate Zones in the SCE service area. Starting September 1, 2021, SCE has set the FPI at 13 for most areas and most events based on an analysis of historical fire data without increasing the risk of significant fire events. A higher FPI should result in fewer PSPS events, all other factors remaining equal.

Exceptions in which the FPI threshold will continue to be set at 12 include:

- Fire Climate Zone 1 (FCZ1) (Coastal region) — The threshold for FCZ1 is staying at 12 because probability calculations indicated a significantly higher ignition risk factor at an FPI threshold of 13 for this FCZ than for all the other FCZs. For more details, please reference SCE's technical workpaper, available at: https://download.newsroom.edison.com/create_memory_file/?f_id=609d61cbb3aed37d0f3d5f6a&content_verified=True
- Geographic Area Coordination Center (GACC) preparedness level of 4 or 5 — The GACC coordinates multiple federal and state agencies to track and manage regional fire resources. It provides a daily fire preparedness level on a score of 1-5. A high score signals that there could be resource issues in responding to a fire.
- Circuits located in an active Fire Science Area of Concern (AOC) — AOCs are areas within FCZs that are at high risk for fire with significant community impact. This designation is based on factors that are common to FPI as well as egress, fire history, and fire consequence. Further details about AOCs can be found in SCE's WMP.

Additionally, for those circuits where SCE has replaced bare wire with covered conductor, de-energization wind thresholds will be moving from the lower of the National Weather Service's (NWS) wind advisory levels (defined as 31 miles per hour (mph) sustained wind speed and 46 mph wind gust speed) or the 99th percentile of historical wind speeds, to 40 mph sustained/58 mph gusts, which aligns with the National Weather Service high wind warning level for windspeeds at which infrastructure damage may occur. Other factors, such as maintenance issues, could lower the thresholds for certain circuits during specific events.

Question 4: Please provide an update on sharing a technical decision fact sheet with public safety partners and publishing the same information on your website.

Response:

SCE created a microsite for our technical decision-making explanatory materials, available at www.sce.com/pspsdecisionmaking.

The site includes the following items:

- *Public Safety Power Shutoff: A Tool of Last Resort* (three-minute animated video), also available for downloading from YouTube.
- *Public Safety Power Shutoff: Decision-Making* (four-page infographic-style fact sheet). Can be downloaded for distribution by the public.
- *Quantitative and Qualitative Factors for PSPS Decision-Making* (12-page technical paper) originally posted on May 1, 2021, and revised and reposted on August 31, 2021. Can be downloaded for distribution by the public. Appendices are available at a separate link (sce.com/pspsdecisionmakingappendices).
- Frequently Impacted Circuits: Link to web page with address look-up function for addresses on SCE's list of 72 frequently impacted circuits.
- Additional story links to relevant articles posted on Energized.com.

Links to our fact sheet and technical paper are also on www.sce.com/psps.

Engagement with Local CBOs:

Question 5: Please provide an update on engaging with local CBOs, particularly, any increase on the number of the CBOs engaged and the support provided to the local community.

Response:

SCE launched its CBO marketing and outreach efforts supporting wildfire and safety preparedness on October 1, 2020. Through a request for proposal (RFP), SCE contracted 50 CBOs for ongoing incentivized partnerships in high fire risk areas. These CBOs were intentionally selected to help reach critical audience segments representing underserved communities, including low-income, senior, disabled, access and functional needs, non-English language, hard-to-reach, and high fire risk areas. The objective of this pay-for-performance model is to further engage our CBO partners to help educate constituents about wildfire and how to be prepared in the event of a disaster or a PSPS event within their communities. SCE provides the CBOs with monthly messaging that supports emergency preparedness, wildfire efforts, PSPS notification/alerts, and information on customer assistance programs, including the Medical Baseline and Customer Care Backup Battery programs. CBOs are required to share this information through different communication channels, social media, newsletters, e-blasts, etc., as part of the incentive program. In addition, SCE works with these CBOs to attend webinars or "live" events via Facebook or Instagram to speak on the different resources available to increase awareness and participation within communities.

These 50 CBOs are part of a much broader network of 1,600 uncompensated CBOs that SCE engages with. See SCE's response to Question 6 below for more details.

In August, 2021, SCE entered into a partnership with the 211 California Network to provide additional support in advance of PSPS events through outreach and education on emergency preparedness, as well as in-event support through direct services such as meal delivery, transportation, and temporary lodging, as well as 24 x 7 call support. This partnership supports a broader statewide effort, as SDG&E began a similar effort with 211 in late 2020, and PG&E recently entered into a partnership with the 211 California Network.

Throughout 2021, SCE has collected input from community leaders related to the development of a climate risk vulnerability assessment (VA) to be filed with the CPUC in May 2022. As part of this work, SCE is issuing an RFP to identify community leaders for paid roles in collecting feedback from disadvantaged vulnerable communities (DVCs) in SCE's service territory to inform proposed strategies resulting from the VA findings. Selected CBO leaders will form SCE's new Climate Resilience Leadership Group (CRLG). SCE will collaborate with its CRLG to educate and inform DVCs on climate change risks, share its VA findings related to SCE's infrastructure, operations and services and collect feedback from DVCs to inform SCE's climate adaptation work.

Question 6: If you have significantly fewer partnerships with CBOs than your peer utilities included on this letter, please explain why that is the case. For example, we heard at the briefings that PG&E only has a few hundred CBO partnerships while SCE has over a thousand.

Response:

SCE has relationships with more than 1,600 community- and faith-based organizations, collectively called CBOs, within its service territory. SCE communicates with the vast majority of CBOs through quarterly newsletters communicating important messages, including programs to support PSPS and wildfire preparedness, but may engage with them more frequently if a particular need arises (e.g., COVID-19 pandemic) to inform them of SCE's consumer protections and assistance available to customers.

SCE engages 50 CBOs through a pay-for-performance program as described above.

Question 7: In addition, how does your company compensate CBOs who are engaged on PSPS events? Do ratepayers pay these costs?

Response:

For CBOs to receive the incentive payment referenced in the description of the pay-for-performance model provided above, each CBO is required to submit monthly reporting to highlight their outreach efforts. Each CBO reports on the following:

- # of Digital Webinars / Events
- # of on-line activities (social media post, e-blast, newsletters, etc.)
- # of constituents reached through each communication channel

Once reports are received and reviewed, SCE will process the incentive disbursement. Incentives are distributed quarterly. To ensure prudent use of funds, SCE has one-on-one check-in meetings

with CBOs to regularly assess performance, in addition to requiring the monthly reporting described above.

Expenses for CBO incentives and outreach materials are recorded in SCE's wildfire mitigation plan memorandum account until cost recovery can be sought through an appropriate funding request before the Commission. If cost recovery is approved, these costs would be recovered from SCE's customers.

Medically Vulnerable Customers and Equipment:

Question 8: Please identify the number of medically vulnerable customers dependent on powered medical equipment in areas potentially impacted by PSPS that have not received the backup batteries your company has committed to providing as of the date of this letter.

Response:

SCE's Critical Care Backup Battery (CCBB) program provides a free portable backup battery to customers that enroll in the program to support their resiliency needs. Eligible customers must be enrolled in the Medical Baseline program (dependent on an electrically powered medical device), enrolled in an income-qualified program (CARE or FERA), and located in a HFRA. In February 2021, SCE expanded the CCBB program to include all customers enrolled in Medical Baseline.² As a result of the expansion, SCE identified approximately 12,000 customers eligible to receive a portable backup battery.³ SCE is committed to providing a battery to all customers that enroll in the program. From January 1, 2021, to August 31, 2021, SCE has enrolled 5,003 customers into the program. Of those 5,003 enrolled customers, SCE has deployed 4,542 batteries with 513⁴ remaining to be delivered (as of August 31, 2021). SCE expects to deliver those 513 batteries within the typical deployment timeframe as outlined in SCE's response to Question 9 below. Approximately 3,500 customers have declined the program, closed their SCE account, or not responded to SCE's contact attempts. SCE continues to reach out to approximately 5,000 customers that have not yet enrolled in the program, which includes 1,500 newly eligible customers since February of 2021.

In addition, SCE is augmenting its battery backup program by collaborating with 211 services to provide transportation and temporary lodging to customers with access and functional needs during PSPS events as described in the response to Question 5 above.

Question 9: What is the total number of batteries that will be deployed and the timeline to achieve full deployment of the batteries?

² In 2020, the CCBB program was limited to a subset of medical baseline customers known as critical care customers. SCE outreached to all eligible critical care customers in 2020 to offer them an opportunity to receive a free backup battery through the program. To increase backup battery deployments in SCE's service area, SCE expanded the program to all eligible medical baseline customers in February 2021.

³ SCE continues to identify new customers each month and has conducted outreach to over 1,500 additional customers, beyond the 12k identified in February 2021.

⁴ Numbers may not sum due to customers who may have enrolled in late 2020 and received a battery in early 2021.

Response:

In 2021, SCE anticipates that it will exceed 5,000 battery deployments. SCE will continue to conduct monthly outreach to enroll all eligible customers who are willing to participate in the program. Once a customer agrees to enroll in the CCBB program, the battery deployment contractor works with the customers availability to schedule a time that is convenient for the customer to receive the battery. The average time to deploy a battery is typically 1-2 weeks from enrollment.

Question 10: Please explain in detail how you educate the customers on operating the batteries and how your company services or replaces batteries that are not working.

Response:

At delivery, customers are provided with education on how to safely operate the battery. Educational materials, warranty information, and a Quick Start Guide are provided to the customer with a direct contact number for customers to call for any follow-up questions or warranty issues. SCE enhanced the Quick Start Guide to incorporate customer feedback, such as increasing font sizes for ease of use.

If a customer's battery is defective, it is replaced with a new battery within 24 hours of a customer providing notification. The new battery is delivered to the customer's home by a supplier for the CCBB program and the defective battery will be retrieved upon delivery of the new battery. Since our program launch, less than 2% of the batteries deployed have been identified as defective.

Question 11: What is the size and duration of each battery?

Response:

As noted in SCE's opening comments to the Phase 3 Scoping Memo in Rulemaking 18-12-005, the CCBB program currently provides three different portable battery sizes (1,500W, 3,000W, or 6,000W) to provide flexibility to energize a customer's electric medical equipment for at least two hours. SCE designed its free battery program to be a temporary solution to assist the customer in making longer-term arrangements, and depending on the medical equipment being powered, the battery provided could last longer than two hours. For example, given the same environmental and operational factors, a 3,000W battery would provide a 90W CPAP machine 33 hours of run time, but would only provide four hours of run time for a 670W oxygen machine and only two hours of run time for a 1,500W dialysis machine.

Question 12: What are the prices of back-up generators that your company provides to customers and that your company provides rebates for (i.e. only partial cost deferral)?

Response:

Critical Care Backup Battery Program:

Below are the current retail prices for the clean-energy portable backup batteries offered in the CCBB program. The CCBB program does not offer rebates, all batteries are provided at no cost to eligible customers.

CCBB Program Battery Size	Cost per Battery ⁵
1500W	\$ 1,999.95
3000W	\$ 3,399.95
6000W	\$ 5,399.95

Rebates through SCE’s Marketplace:

SCE provides rebates for portable generators offered through SCE’s Marketplace, and the qualified product list for these portable generators range in price from approximately \$300 to \$4,000.⁶ In 2021, the average cost that customers paid for a portable generator was \$788 before application of the SCE rebate. SCE also offers a rebate for portable power stations and the qualified product list for these portable batteries range in price from approximately \$100 to over \$13,000.⁷ In 2021, the average cost that customers paid for a portable power station battery was \$303 before application of the SCE rebate.

Question 13: What is the value of the rebates that your company provides?

Response:

The rebates for the portable generators that SCE offers start at \$200 (for customers in HFRA) and go to \$500 (for CARE-, FERA-, or Medical Baseline-enrolled customers in HFRA). The rebate amount will not exceed the price of the portable generator. SCE offers a \$75 rebate (for customers in HFRA) for portable batteries.

Question 14: What fuel is being used in back-up generators?

Response:

The fuel source for generators offered on SCE’s online marketplace varies by manufacturer and model but includes propane, natural gas, and gasoline. SCE’s back-up generators utilized for SCE’s resiliency zones and other public safety needs include Tier 4 clean diesel. Tier 4 diesel engine standards are the strictest EPA emissions requirements for diesel engines. The Tier 4 requirement regulates the amount of particulate matter and nitrogen oxides that can be emitted from the engine.

Access and Functional Needs Customers:

Question 15: Provide an update on your company’s efforts to identify AFN customers in your service territory, particularly those in high fire risk areas. How granular is this information and how is your company using it to mitigate the impacts of PSPS on these customers?

⁵ Goal Zero power station retail pricing can be found at <https://www.goalzero.com/shop/portable-power/power-stations/>.

⁶ SCE’s generator Marketplace is available at: <https://marketplace.sce.com/portable-generators/>

⁷ SCE’s portable power station Marketplace is available at: <https://marketplace.sce.com/portable-power-stations/>

Response:

SCE uses internal data from programs that customers enroll in or designations SCE has on record that match an AFN definition, such as Medical Baseline, income-qualified programs such as CARE or FERA, non-English speaker, older adult, those that receive a bill in an alternate format such as large font or Braille, and those that self-certify as having a medical condition that could become life-threatening if service is disconnected. In addition to data stored in SCE's customer service system, SCE has identified some segments of the AFN population with the help of a third-party vendor and has added this data at an aggregate level to our data set that SCE can access through our Customer Care Dashboard at the circuit level. SCE tracks and monitors the following AFN designations in our Customer Care Dashboard: children, critical care, disabled, limited-English, low-income, Medical Baseline, and seniors. Finally, SCE conducts research on the needs and opinions of our AFN customers.

SCE continues customer outreach to increase enrollment in programs such as Medical Baseline through broad-based marketing strategies, partnering with state agencies and healthcare-related organizations. For example, SCE holds quarterly training meetings with In-Home Supportive Services (IHSS) and delivered in-language flyers and messaging promoting Medical Baseline to IHSS program managers and members of the Statewide AFN Council. SCE also partnered with the Hospital Association of Southern California (HASC) to promote Medical Baseline in HASC's newsletter. The newsletter encouraged medical professionals to promote Medical Baseline with patients who may qualify, and it was distributed to 185 hospitals with approximately 8,500 addresses. The list of addresses covers member hospital C-Suite, managers, hospital staff, associate members, and leadership in HASC's partner organizations.

In partnership with other IOUs and state agencies, SCE obtained aggregated counts at a zip-code level of clients from IHSS, Regional Centers, and Medicare who are designated as dependent on electricity for medical needs. SCE used this information, in combination with internal data, to develop a heatmap in Geographic Information System. This tool will be used internally to help inform decisions such as locations to deploy Community Resource Centers (CRC) and Community Crew Vehicles (CCV) and to identify geographic areas to target Medical Baseline promotion.

In August of this year, SCE developed an AFN landing page for our AFN customers to find information that may pertain to their needs. SCE is expecting to expand capabilities on this landing page by mid-September for customers to self-certify.⁸ This will increase opportunities for customers who may have a serious illness or condition to self-certify, increasing visibility of this segment of AFN customers in our service territory.

SCE's Customer Care Team plays a key role during a PSPS Incident Management Team activation, including assessing potentially impacted areas, reviewing potentially affected customers, and prioritizing and optimizing available resources. The team monitors circuit segmentation and customer data to provide informed recommendations on the deployment and activation of CRCs or

⁸ Pursuant to Commission Decision 12-03-054, SCE customers may self-certify that they have a serious illness or condition that could become life threatening if service is disconnected. These customers receive an in-person visit prior to disconnection, if they cannot be reached by other means.

CCVs to the impacted areas. SCE's Customer Care Dashboard provides customer data, including the above-mentioned AFN designations, to inform dispatchable resources, such as bulk water and generators for critical infrastructure by affected circuits, if necessary. This information is used to provide a more detailed picture of potential PSPS impacts and to prioritize activation of CRCs and CCVs by considering the number of customers affected, AFN populations, critical infrastructure, and areas impacted by the events.

Additionally, prior to a PSPS de-energization, SCE will perform an In-Event PSPS risk calculation, which weighs the impacts of PSPS, including the impacts to AFN populations by circuit utilizing our AFN data, against dynamic wildfire risk. During PSPS events, SCE will also utilize the list of customers enrolled in the Medical Baseline program to conduct escalated contact attempts, in-person visits, if necessary, if PSPS notification delivery is not confirmed.

Community Resource Centers:

Question 16: How do you measure if the CRCs meet the community need?

Response:

After every CRC activation, SCE sends out a survey soliciting feedback from customers who visited the CRC and provided their e-mail address. On a scale of 1-10, with 10 being extremely satisfied, the cumulative average customer satisfaction rating is 8.6 for the period of 2020 and 2021 (through July), with almost 52% of respondents rating overall satisfaction a 10.

Question 17: Have any public officials in your service territory requested additional CRCs?

Response:

Yes, public officials have requested pop-up CRCs to be activated at or near impacted communities during a PSPS event. Pop-up CRCs are locations that are not contracted as a CRC location but are used as a temporary CRC location.

The following is an example of how SCE's outreach and coordination efforts with local governments resulted in the addition of a new CRC to our portfolio: In December of 2020, SCE's Government Relations Manager met with LA County Supervisor Barger's Office to discuss CRC coverage in case of a PSPS de-energization. During this meeting, SCE was made aware of a need for CRC coverage in the Chatsworth area, and the Chatsworth Lake Church was identified as a safe and visible location for local community members. As a result of this external feedback, SCE worked with the site contact to immediately utilize the site as a pop-up CRC, and soon after, we contracted with the site as a contracted CRC and utilized it to support the local community during multiple PSPS events.

Additionally, SCE regularly meets with local and tribal governments to request input on contracted CRC locations. Input from local and tribal governments led SCE to establish many of its CRCs. During PSPS events SCE also consults with local and tribal governments on which CRC locations to open for the event, including the need for pop-up CRCs.

Question 18: Have additional CRC locations been requested but not granted? If so, why not?

Response:

SCE has not denied any request to establish CRCs.

Tribal Government Outreach:

Question 19: Please provide an update on your company's consultation with tribal governments.

Response:

SCE continues to engage with the nine tribal governments located in SCE's HFRA to provide information, updates, and resources on wildfire mitigation and PSPS.² SCE's assigned liaisons are in regular contact with tribal governments. Most current engagement is virtual due to the COVID-19 pandemic. We have held individual briefings and workshops to ensure participation from all tribal governments.

SCE hosted a PSPS workshop for tribal governments on March 25, 2021, where we shared information about our wildfire mitigation activities, PSPS Action Plan, customer programs, PSPS notifications, PSPS Public Safety Partner Portal, and resiliency plans.

SCE held training sessions on Aug. 2 and 8, 2021, specifically for tribal governments on the Public Safety Partner Portal.

SCE continues to engage tribal governments regarding establishing a CRC on their reservations. Tule River Tribe has identified three sites to host a CRC.

SCE is also working with tribal governments to promote customer care programs for tribal members, such as the Self Generation Incentive Program, and discuss resiliency opportunities. For example, we are installing backup power equipment to connect temporary generation to keep a market owned by the Bridgeport Colony Indian Nation in Mono County energized as a part of a Resiliency Zone.

SCE also continues to engage the Southern California Tribal Emergency Management Group, which consists of emergency management officials from most of the tribal governments. Several tribal governments are also represented on our quarterly PSPS Working Groups and Advisory Board.

SCE is also creating a web page on its website dedicated to tribal governments, which will include links to information and resources on wildfire mitigation and PSPS.

² Tribal governments located in SCE's HFRA include: The Agua Caliente Band of Cahuilla Indians, Benton Paiute, Bishop Paiute Indian Tribe, Bridgeport Indian Colony, Morongo Band of Mission Indians, Pechanga Band of Luiseno Indians, San Manuel Band of Mission Indians, Soboba Band of Luiseno Indians, Tule River Tribe.

PSPS Exercises:

Question 20: Please provide an update on the lessons learned from last year and this year's exercises. How will these lessons be applied to actual PSPS execution for improvement?

Response:

SCE conducted PSPS exercises on May 27, 2020, June 23, 2020, July 7, 2020, July 9, 2020, July 14, 2020, July 29, 2020, April 16, 2021, April 19, 2021, April 23, 2021, April 27, 2021, April 28, 2021, May 18, 2021, June 25, 2021, and August 19, 2021. External stakeholders were invited to and participated in SCE's PSPS exercises on May 27, 2020, July 29, 2020, April 27, 2021, April 28, 2021, and August 19, 2021. Below, SCE provides a summary of the lessons learned in these exercises.

2020

- Several participants expressed that they would like to receive additional hands-on training to become more familiar with new processes and tools.
- Not all personnel had access to specific tools and resources needed for an activation.
- Although a video and job aid were created for participants, there was confusion regarding the operation of Microsoft Teams during an activation, specifically the maneuvering between established channels.
- The compressed exercise timeline did not allow all participants to thoroughly participate in their designated roles, specifically the creation of typical deliverables.
- Specific details regarding generator support requests, including the prioritization and fulfillment of requests was not fully understood.
- Circuit outage information could not immediately be viewed by team members, which resulted in confusion and a loss of situational awareness.
- Team members were unaware of customer service protocols regarding non-PSPS related customer notifications during a PSPS event (e.g., repair outage).

2021

- Exercise participants requested that future exercises incorporate more transmission-level exercise components in order to test both grid reliability concerns and transmission customer notifications.
- Continue to involve public safety partners and encourage them to actively participate in the exercise to further strengthen the collaboration and communication between our agencies.
- Not all participants fully understood the generator request process and procedures.
- There is room for improvement in multi-incident information sharing across different functional Incident Management Teams (IMT). Individual IMTs performed very well in their area of focus; however, some teams did not proactively share incident updates with other teams.
- Incident Commanders should be more proactive in ensuring teams and personnel are proactive in providing incident updates, information sharing, and cross-incident or cross-hazard situational awareness.

Lessons learned that are identified in exercises are included as part of a Corrective Action/Improvement Plan, which assigns a point of contact for each item and requires them to create a remedy to address each issue. Once the remedy has been approved and implemented, it is evaluated in an exercise or real-world event to validate the remedy. The identified lesson learned regarding the generator request processes was addressed in 2020 by formalizing the request process, and was validated through a table-top exercise in November 2020. Lessons learned from 2021 exercises are being addressed through the improvement process by assigning appropriate corrective actions and responsible parties to complete.

Pilot Project:

Question 21: As part of Governor's Executive Order from last year, CPUC ordered the utilities to propose pilot projects that support both grid hardening work and underserved communities. Please provide an update on your pilot projects.

Response:

Based on correspondence with Safety Enforcement Division staff, SCE understands that this question refers to a broadband pilot discussed during another IOU's PSPS briefing. SCE also has a potential broadband pilot aimed at supporting vulnerable customers, and provides an update to that pilot here in case it is useful.

On June 30, 2021, SCE filed before the Commission the details of its two potential pilots pursuant to the April 20, 2021 Assigned Commissioner's Amended Scoping Memo and Ruling in Phase II-A of R. 20-09-001, as modified by the schedule set forth in Administrative Law Judge Glegola's July 13, 2021 email ruling. The IOUs' potential pilots are to inform the Commission on a series of questions relating to making more IOU fiber available to support broadband in unserved or underserved communities. SCE's potential pilots support broadband to unserved or underserved communities and involve possible middle mile (*i.e.*, wholesale) dark fiber leases.

Pilot No. 1 involves the potential provision of middle mile service to a municipality (Ventura County) that, in turn, will offer internet service to households and businesses within its unserved or underserved communities. SCE responded to Ventura County's Request for Information and is waiting for further information or instructions from Ventura County. Pilot No. 2 involves another dark fiber middle mile project with a wireless internet service provider (WISP) who will provide high speed internet service in the lower Colorado River Valley. SCE participated in the WISP's RFP and is waiting to hear whether the WISP has accepted SCE's bid. Parties in R. 20-09-001 filed opening comments on the utilities' pilot proposals on August 30, 2021 and reply comments on September 13, 2021. Pursuant to the procedural schedule set forth in the August 2, 2021 Assigned Commissioner's Second Amended Scoping Memo and Ruling, the Commission's proposed decision on Phase II-A is "to be determined."

Conclusion:

SCE appreciates this opportunity to update the Commission on its preparations for the 2021 wildfire season, specifically with regard to SCE's PSPS operations.

Sincerely,

/s/ Kevin Payne

Kevin Payne

cc:

Service List R.18-12-005 and I.19-11-013

Caroline Thomas Jacobs, Director, Office of Energy Infrastructure Safety
(caroline.thomasjacobs@energysafety.ca.gov)

Rachel Peterson, Executive Director, CPUC (rachel.peterson@cpuc.ca.gov)

Arocles Aguilar, General Counsel, CPUC (arocles.aguilar@cpuc.ca.gov)

Leslie Palmer, Director, Safety & Enforcement Division, CPUC (leslie.palmer@cpuc.ca.gov)

Edward Randolph, Deputy Executive Director for Energy and Climate Policy, CPUC
(edward.randolph@cpuc.ca.gov)

Meredith Allen, Senior Director, PG&E Regulatory Regulations (meae@pge.com)

William Blattner, Manager, Regulatory Relations, San Diego Gas & Electric
(wblattner@semprautilities.com)

Diana Gallegos, Director of State Regulatory Relations, Southern California Edison
(diana.s.genasci@sce.com)