

*Southern California Edison*

*WSD-011 – Resolution implementing the requirements of Public Utilities Code Sections 8389(d)(1), (2) and (4) related to catastrophic wildfire caused by electrical corporations subject to the Commission’s regulatory authority*

**DATA REQUEST SET Cal Advocates - SCE - 2021 WMP - 09**

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**Received Date: 3/4/2021**

**Response Date: 3/9/2021**

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**Question 008:**

The following questions relate to Table 1 of the non-spatial WMP data tables. All questions specifically concern inspections of distribution facilities in HFTD areas. For purposes of this data request, “high-priority findings” mean Level 1 and Level 2 inspection findings.

This table shows rates of high-priority findings per mile of detailed inspections in HFTD areas, based on Table 1 of SCE’s 2021 non-spatial WMP data tables.

- a) Explain the factors that resulted in a much lower rate of high-priority findings per mile on detailed inspections in 2019 than in any other year from 2015 to 2020.
- b) Explain the factors that resulted in significantly fewer high-priority findings per mile on detailed inspections in 2020 than in 2015 through 2018.

Level 1 & 2 findings per mile of detailed inspections						
	2015	2016	2017	2018	2019	2020
SCE	4.76	4.49	4.37	2.98	0.71	1.62

**Response to Question 008:**

Upon further review of the data submitted in the WMP, an error was found on how the numbers for both Level 1 and 2 findings in HFTD for detailed inspections – Distribution lines were produced. For 2018-2020, both Level 1 and 2 findings in HFTD for detailed inspections – Distribution lines were undercounted. Counts of Level 1 and level 2 findings due to detailed inspections were inadvertently counted in all Level findings due to both “other inspections” and “patrol inspections” type inspections. This error occurred because the flag stating the findings were due to Enhanced Detailed Inspections (EOI) was incorrectly used. As such, large counts of findings for all levels were inadvertently counted in both “other inspections” and “patrol inspections.” The table below shows the updated Level 1 and level 2 findings and the calculated findings per miles of detailed inspections. The updated numbers are in Red.

Level 1 & 2 findings per mile of detailed inspections						
	2015	2016	2017	2018	2019	2020
Level 1 findings in HFTD for detailed inspections - Distribution lines	2,163	3,146	3,114	2,834	4,144	2,680
Level 2 findings in HFTD for detailed inspections - Distribution lines	7,297	7,752	5,841	16,646	71,791	28,454
Level 1 + 2 findings in HFTD for detailed inspections - Distribution lines	9,460	10,898	8,955	19,480	75,935	31,134
Number of Circuit Miles Inspected from Detailed Inspections in HFTD – Distribution Line Miles	1,986	2,425	2,049	2,550	15,215	16,450
Level 1 & 2 findings per mile of detailed inspections	4.76	4.49	4.37	7.64	4.99	1.89

- a) After the update seen above, (in red) 2019 is actually slightly higher than the average find rate for 2015-2018, but the 2019 find rate increased significantly as compared to the average 2015-2017. This significant increase can be attributed to inspections prioritizing the highest risk areas during the start of the EOI program. This is because the focus of the program was the highest risk areas and the EOI program increased inspection focus on specific types of hardware and equipment on the distribution system to minimize wildfire risk. The increased focus based on specific types of hardware and equipment performance on the distribution system resulted in an increased find rate.
- b) After the updates seen above, (in red) 2020 increased slightly, but is still below the average for 2015-2018. The lower find rate can be attributed to the change in detailed inspection cycles and additional detailed inspection programs. The high fire risk informed inspection program shortened the time-period assets are re-inspected based on risk, compared to the years 2015-2018. Additionally, in 2020, assets may have been inspected by multiple detailed inspection programs such as aerial and/or areas of concern, resulting in an increased inspection circuit mile count and decreased findings count. The combination of detailed inspection cycle times and the additions of other detail inspection programs resulted in a lower find rate in 2020.