

December 17, 2015

Elizaveta Malashenko, Director
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Response to Information Request Regarding Increased Hazards Due to El Niño

Dear Ms. Malashenko:

Southern California Edison Company (SCE) respectfully submits the following information in response to the California Public Utilities Commission (CPUC) Safety and Enforcement Division's (SED) request for information regarding SCE's preparation activities for the 2015-16 El Niño storm season. This response provides an overview of SCE's ongoing preparation activities for El Niño, specifically addressing each request identified in SED's December 1, 2015 letter.

1. Identify any specific areas of concerns relating to El Niño, either particular areas or particular equipment or infrastructure, that your company has identified, and the steps being taken to address those concerns

In preparing for the forecasted 2015-16 El Niño season and the prospect of severe weather this winter and spring, SCE completed a hazard analysis and developed appropriately prompt and proactive mitigation and response strategies that are currently being implemented. These activities exceed the routine preparation and expense that SCE customarily experiences for inclement weather in its service area, in order to address the greater-than-average rainfall predicted for El Niño. As explained below, our activities are focused in particular on the Goleta/Santa Barbara area.

SCE's El Niño Hazard Assessment Methodology is detailed in Attachment A, and identifies four types of hazards (landslides, debris flow, flooding, and high winds) associated with the forecasted increase in storm events due to El Niño. Using its Geographic Information Systems (GIS), SCE analyzed and ranked these hazards according to risk for various infrastructure types, and identified specific areas of concern. The specific areas that raised concerns were the systems in Saugus, Viejo, Padua, and Goleta. However, upon further analysis, SCE's Grid Control Center personnel determined that three of these four systems—Saugus, Viejo, and Padua—did not require site-specific mitigation strategies.

The fourth area—Goleta—was determined to require a site-specific mitigation strategy because of that area’s unique operational characteristics, the hazards present there, and the fact that a long-term solution underway to meet Goleta’s needs will not be available before anticipated El Niño storm events. SCE is therefore implementing a focused, short-term contingency plan for this region that includes the following actions:

- Leasing and pre-staging mobile generators to aide in serving essential load in the event of a transmission or distribution emergency;
- Obtaining emergency generation from NRG’s Ellwood Generating Station; and
- Operating 66kV tie lines at the emergency limit of 150 MW for up to four (4) hours a day.

SCE underscores that the use of mobile generators is a temporary, but necessary, mitigation strategy to address the risk of potential extended outages resulting from a severe El Niño storm event. SCE continues to work on a longer-term solution to meet the needs of Santa Barbara and surrounding communities in a manner consistent with the state’s Greenhouse Gas and preferred resources policies.

SCE is also undertaking several other mitigation activities throughout our service area. An overall list of SCE’s El Niño mitigation activities, including the Goleta contingency plan, is included in Attachment B. These activities include:

- Providing refresher training to personnel;
- Restocking and repairing emergency and electrical equipment;
- Coordinating with local emergency response officials;
- Conducting pre-storm season inspections and maintenance activities; and
- Enhancing situational awareness efforts by initiating pre-storm coordination calls within five (5) days prior to a forecasted event and activating teams in advance to a severe storm hitting our service area.

To ensure that the company is taking an appropriately aggressive approach to preparing for the intensity and frequency of storms forecasted during the 2015-16 El Niño season, SCE has also developed a Severe Weather Response Plan (SWRP), which is included as Attachment C. The SWRP is an addition to SCE’s existing Storm Plan, and intended to help address the unique short-term threats forecasted for the 2015-16 El Niño season. This plan defines how SCE will prepare resources and personnel up to five (5) days before a storm’s arrival, and describes the phased activation procedure to be used before the effects of severe weather occur. The SWRP is designed to operate concurrently with SCE’s other operational and response plans, including the All-Hazards Plan, Storm Plan, and specific procedural documents for individual Operational Units.

Additionally, SCE will soon be conducting an exercise and workshop to prepare people internally and externally, respectively, for an El Niño event. On December 17, 2015, SCE conducted an internal tabletop exercise with its Incident Management Teams, to familiarize them with the SWRP and its appendix, the North Coast Tactical Plan (NCTP). (The NCTP is included as Attachment D.) Among other things, this exercise served to ensure that the plans' contents and actions are clearly understood and agreed upon by SCE personnel. The exercise also served to identify any processes and procedures that need to be updated in the SWRP and NCTP, based on the team's discussions following the exercise. It should be noted that the attached drafts of the SWRP and NCTP may be further refined depending on the results of SCE's internal tabletop exercise and the resulting discussions among our staff.

On December 16, 2015, SCE hosted an El Niño Readiness Workshop with stakeholders across the emergency management community in SCE's service area. This workshop's objective was to provide emergency management stakeholders critical information regarding SCE's El Niño planning efforts and identify opportunities for improved collaboration and coordination between SCE and the emergency management community.

2. Identify any specific actions or approvals that your company expects to request from the CPUC to prepare for, or respond to, El Niño and related conditions

SCE expects to incur incremental costs associated with leasing, engineering, and site preparation for its contingent generator strategy. On November 30, 2015, SCE filed an advice letter with the CPUC to establish the El Niño Preparedness Memorandum Account (ENPMA) that will allow SCE to record incremental costs associated with preparing for the predicted El Niño. SCE's advice letter is included in Attachment E.

The ENPMA will allow SCE the opportunity to recover the incremental costs associated with these mitigation activities at some future date. The establishment of this memo account does not guarantee recovery in rates of any of the recorded costs prior to CPUC review and approval. After the costs have been incurred, SCE will provide the CPUC and other parties an opportunity to review the costs in an annual Energy Resource Recovery Account (ERRA) Review proceeding. In that application, SCE will request recovery of only those costs associated with the El Niño preparedness work that are in excess of amounts authorized in SCE's 2015 General Rate Case.

As discussed above, the ENPMA will be used to record only those incremental costs incurred in preparation for the storms. However, should this El Niño—or the prospect of the El Niño creating damage that impacts SCE customers—cause the Governor to declare

a state of emergency, any costs associated with restoring power for customers as a result of rain and wind storms will be recorded in a Catastrophic Event Memorandum Account (CEMA). SCE will not record any of those CEMA-related costs until after the CEMA is activated in response to a Governor declaration. SCE may also make other filings at the Commission as necessary and as our analysis of the situation develops.

3. Describe any inventories build up that is specific for El Niño

In preparation for El Niño, SCE conducted a historical analysis of significant weather-related events that have affected our infrastructure, and generally determined that our existing inventory is sufficient. It is important to note that SCE maintains an inventory capable of supporting emergency response efforts, and frequently assesses and updates its inventory levels. SCE's current significant infrastructure replacement efforts, and associated routine operational needs, have resulted in a significantly higher level of distribution materials (poles, transformers, wires and cable) on hand to support emergency response efforts. In addition, SCE is equipped to respond to transmission structure failures with materials on hand, such as bundles of steel to build permanent or temporary towers, as well as a stock of emergency steel poles.

Nevertheless, SCE has identified immediate opportunities to stockpile and locationally position additional materials, such as back-up batteries, sandbags, and other emergency equipment. SCE has also leased additional heavy equipment in remote areas of operations to ensure that its personnel can access needed infrastructure to improve SCE's ability to recover from storm impacts.

4. Describe any agreements with other agencies and utilities to address potential damages and hazards that are caused by El Niño

SCE is an active member in three mutual assistance agreements: 1) the California Utility Emergency Association; 2) the Western Mutual Assistance Agreement; and the Edison Electric Institute Mutual Assistance Agreement. Each agreement is described below.

- **California Utility Emergency Association:** Mutual assistance agreement with investor owned utilities and municipalities operating within California.
- **Western Region Mutual Assistance Agreement:** Mutual assistance agreement with electric utilities throughout the Western United States and Canada. This agreement is facilitated by the Western Energy Institute. Resource requests pursuant to this agreement are coordinated by the Western Region Mutual Assistance Group.
- **Edison Electric Institute (EEI) Mutual Assistance Agreement:** Mutual assistance agreement with investor-owned utilities across the United States.

SCE has also participated in regional and national exercises to validate these agreements' processes and procedures for requesting and obtaining mutual assistance. These exercises are listed below:

- **April 2015 Western Region Mutual Assistance Group:** Tabletop Exercise to validate operating procedures.
 - **October 2105 EEI Mutual Assistance Network:** SCE Functional Exercise utilized to test EEI National Response Event framework and process.
5. **Provide us all written plans detailing your company's preparations for El Niño and related conditions, including heavy rain and snow, mud or debris slides, flooding, river scour, river channel migrations, and erosion**

SCE is providing its operational plans for El Niño as attachments to this response letter. SCE's Severe Weather Response Plan (SWRP) and North Coast Tactical Plan (NCTP) are specifically referenced in the response to SED's first question above, and included as attachments C and D, respectively. More generally, SCE also has a list of emergency plans that are regularly maintained and used in training and exercises. These plans ensure we respond as safely and efficiently as possible to system disruptions, including severe storm conditions. These plans are listed below and are also being provided with this response as Attachments F and G, respectively.

- **All Hazards Plan:** The SCE All-Hazards Plan (AHP) is a capabilities-based response and recovery management strategy that follows the National Incident Management System (NIMS) and the Incident Command System (ICS) principles and protocols developed by the Federal Emergency Management Agency (FEMA). It is a comprehensive plan that builds upon Edison's individual business resiliency and emergency action plans to facilitate an effective companywide response to any size incident or emergency disruption.
- **SCE Storm Plan:** This plan applies to emergency incident responses including but not limited to, severe weather, heat storms, earthquake, flooding, civil disturbance, fire, explosion or other major disruptions to the system.

SCE shares SED's interest in ensuring that all reasonably necessary steps are being taken to prepare for the El Niño storm season. SCE is acting promptly and aggressively to minimize any potential risks to our customers, and damage that may occur, due to severe weather events caused by El Niño across our service area, and particularly in the Goleta system.



Peter T. Dietrich
Senior Vice President
Transmission & Distribution

Please do not hesitate to contact me if you have any questions or require additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read "Peter T. Dietrich", written over a faint, larger version of the same signature.

Peter T. Dietrich

Cc: Edward Randolph, CPUC, Director Energy Division
Peter Allen, CPUC, Deputy Director SED
Cynthia Walker, CPUC, Deputy Director Energy Division
Charlotte TerKeurst, CPUC, Program Manager ESRB
Fadi Daye, CPUC, Program and Project Supervisor ESRB
Ronald O. Nichols, SCE, Senior Vice President Regulatory Affairs
Michael Hoover, SCE, Director Regulatory Affairs
Laura Genao, SCE, Director Regulatory Affairs