

August 18, 2020

Caroline Thomas Jacobs, Director
Wildfire Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

SUBJECT: Southern California Edison's COVID-19 Impacts to 2020-2022
Wildfire Mitigation Plan Initiatives

Dear Ms. Thomas Jacobs,

In compliance with Resolution WSD-004, Ordering Paragraph 7, Southern California Edison Company (SCE) hereby provides updates to scope, timing, and other aspects of wildfire initiatives set forth in our 2020-2022 Wildfire Mitigation Plan (WMP) as a result of the COVID-19 pandemic, including updates to Public Safety Power Shutoff (PSPS) initiatives, as applicable.

BACKGROUND

On March 19, 2020, the Governor of California signed Executive Order N-33-20 (stay-at-home order) requiring Californians to heed the order of the California State Public Health Officer and the Director of the California Department of Public Health that all individuals living in California stay home or at their place of residence, except as needed to maintain continuity of operation of the federal critical infrastructure sectors, in order to address the public health emergency presented by the COVID-19 disease.¹

On March 27, 2020, the Wildfire Safety Division (WSD), the California Department of Forestry and Fire Protection (CAL FIRE), and the California Governor's Office of Emergency Services (Cal OES) sent joint letters regarding essential wildfire and PSPS mitigation work during COVID-19 to each electrical corporation. The joint letters informed that electrical corporations are expected to continue to prioritize essential safety work and make every effort to keep WMP implementation progress on track, including necessary coordination with local jurisdictions. The letters further emphasized that such effort is essential to ensuring that electrical corporations are prepared for the upcoming and subsequent wildfire seasons, while complying with COVID-19 restrictions requiring residents to shelter-in-place, practice social distancing, and comply with other

¹ Executive Order N-33-20. Available at: <https://covid19.ca.gov/img/Executive-Order-N-33-20.pdf>.

measures that California’s public health officials may recommend or that Governor Newsom or other officials may require in response to the COVID-19 pandemic.

On June 11, 2020, the California Public Utilities Commission (CPUC or Commission) ratified the WSD’s Action Statements and associated Resolutions conditionally approving electric utility 2020-2022 WMPs. On June 19, 2020, the Commission issued the final utility Resolutions.

WMP INITIATIVES IMPACTED BY COVID-19

Though the COVID-19 crisis has imposed many challenges, SCE is continuing to focus on wildfire mitigation activities, and is making adjustments as necessary. This is especially important for customer and community safety at a time when they are already dealing with other public safety challenges. At the same time, we are sensitive to the impact SCE’s work might have on customers sheltering in place and critical facilities. Table 1 below summarizes the wildfire mitigation initiatives that have been impacted by COVID-19 restrictions and provides the original plans for these impacted initiatives and the changes in operations as a result of the impact of COVID-19. SCE has and will continue to provide updates on initiatives impacted by COVID-19 in our Assembly Bill (AB) 1054 quarterly advice letter.

SCE remains cautiously optimistic that it will be able to meet most of its year-end 2020 WMP program targets. SCE will continue to monitor and, where possible, accommodate COVID-19-related impacts and will report on any additional developments in its AB 1054 quarterly advice letters, Change Order Reports, and/or in the 2021 WMP update, as applicable.

Table 1: COVID-19 2020-2022 WMP INITIATIVE IMPACTS

COVID-19 Impact Category	2020-2022 WMP Initiative	Program Target	COVID-19 Impact
<p>Low: Change in Operations, but no impact to original pre-COVID-19 completion date</p>	<p>PSPS-2: Community Resource Centers (CRCs) (Section 5.3.6.5.1) PSPS-7: Community Outreach (Section 5.3.6.5.6)</p>	<p>Have 23 CRC sites available across SCE service territory for customers impacted by a PSPS event. Minimum of five Community Crew Vehicles (CCVs) ready to be deployed during times when weather and fuel conditions are at critical levels. Communicate with customers in a local targeted way using a variety of channels to ensure timely delivery of notifications.</p>	<p>Implemented a three-pronged CRC/CCV strategy to activate CRCs and CCVs during COVID-19 health orders (e.g., shelter-in-place and social distancing):</p> <ol style="list-style-type: none"> 1. Virtual CRC/CCV that provides a digital platform where customers are provided relevant information without having to leave their home. 2. Standalone CRC/CCV with social distancing practices, i.e., drive-thru or walk-up CRC/CCV where customers can receive a Customer Resiliency Kit. 3. Partnered CRC/CCV with social distancing practices, i.e., CRC/CCV located at an essential service venue where customers can receive a Customer Resiliency Kit.

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	PSPS-3: Customer Resiliency Equipment Incentives (Section 5.3.6.5.2)	Develop a customer resiliency equipment incentive pilot program that provides financial support to customers willing to increase resiliency within HFRA. One customer will be implemented for this pilot in 2020.	Experienced delays which resulted in a delay by Pilot location (San Jacinto High School) in ordering a circuit breaker and a backup battery Programmable Logic Controller (PLC) required for low voltage wiring due to reduced staff. The equipment ordering delay resulted in a few intermediate project milestones being delayed, but the equipment delay did not impact system readiness date and has since been ordered and installed.
	DEP-1.2: Customer Education and Engagement (Community Outreach Meetings) (Section 5.3.9.2)	Host 8-12 community meetings in areas impacted by 2019 PSPS plus other meetings including online as determined, to share information about PSPS, emergency preparedness, and SCE's WMP.	All Community Meetings were transitioned to virtual meetings due to COVID-19 orders, e.g., shelter-in-place and social distancing. SCE will reserve in-person meetings (when feasible) for more impacted communities.
	SH-1: Covered Conductor Installation (Section 5.3.3.3.1)	Install 700 circuit miles of covered conductor in HFRA. SCE will strive to complete 1,000 circuit miles subject to resource constraints and other execution risks.	Experienced interim delays due to (1) permitting delays as agencies closed or had reduced workforce and (2) cities and local authorities, e.g., Los Angeles County stop work order, not allowing planned outages due to potential impact on customers during safer-at-home orders. Interim delays have been resolved and still expect to meet and potentially exceed the program target for covered conductor installation in 2020.
	SH-3: WCCP Fire Resistant Poles (Section 5.3.3.6.1)	Replace 5,200 poles with fire-resistant (FR) poles in HFRA. SCE will strive to replace 11,700 poles with fire-resistant poles in HFRA subject to pole loading assessment results, resource constraints and other execution risks.	Similar to covered conductor, COVID-19 resulted in interim delay of work due to outage cancellations or limitations based on customers shifting to working from home and social distancing. Despite interim delays, FR composite/wrap pole work has not fallen behind plan.
	SH-12.1 Distribution Remediations (Section 5.3.3.12.1) SH-12.2 Transmission Remediations (Section 5.3.3.12.2)	Remediate 100% of notifications with ignition risk in accordance with CPUC requirements, non-inclusive of notifications which meet the criteria of a valid exception.	Experienced permitting delays due to (1) third-party agencies being closed and/or reduced workforce which caused delays in obtaining permits to perform work and (2) pushback from customers and local governments against performing work (especially work that requires de-energizations). Most permitting delays resolved by June 2020.
	IN-1.1: High Fire Risk Informed (HFRI) Inspections of	Inspect 105,000 structures in HFRA.	Reduced number of non-local inspectors that were available to work due to COVID-19, e.g., social distancing and lodging limitations. SCE decided to pair inspectors in smaller groups to

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	Distribution Electric Lines and Equipment (Section 5.3.4.9.1)		minimize COVID-19 risk exposure which initially led to fewer inspections per day but on track to exceed program target.
	IN-1.2: High Fire Risk Informed (HFRI) Inspections of Transmission Electric Lines and Equipment (Section 5.3.4.10.1)	Inspect 22,500 structures in HFRA.	Re-prioritized inspections schedule because access issues emerged in some areas due to COVID-19. Did not significantly impact crew productivity.
	SA-1: Advanced Weather Monitoring and Weather Stations (Section 5.3.2.1)	Install 375 Weather Stations.	Weather station wind sensor manufacturer temporarily shut down operations in March 2020. Weather station solar panels experienced supplier shipping delays in April 2020. Both supplier issues were resolved and are no longer impacting Weather Station installations.
	OP-2: Wildfire Infrastructure Protection Team Additional Staffing (Section 5.3.6.5.7)	Hire additional resources including: a senior compliance manager, two compliance advisors, a project/program advisor, a data specialist and a fire-weather meteorologist. PSPS Operations will also be staffed to provide dedicated operational, project management, and compliance capabilities.	Recruiting was delayed due to increased scope of PSPS Readiness IMT, COVID-19 impact planning, and additional regulatory engagements reduced the time available to focus on recruiting. Positions expected to be posted in Q3 and filled in Q4 to meet program target.
	AT-2.2: Advanced Unmanned Aerial Systems (UAS) Study (Section 5.3.4.9.2.1)	Conduct additional EVLOS demonstration UAS flights using lessons learned from 2019 study and validate aerial patrol findings via truck, foot, or helicopter.	Limited ability of vendors to travel to an in-person Technical & Safety demonstration. SCE has developed mitigation strategy to move forward with in-person demonstration while observing social distancing. SCE has remained largely on schedule and believes it can be fully back on track by completing T&S qualifications in August 2020.
	AT-4: Vibration Dampers (Section 5.3.3.3.3)	Evaluate damper technologies for both small and large diameter covered conductor applications and develop standards for small and large diameter covered conductors.	In-field testing delayed due to limited ability of the vendor to field test large diameter conductor vibration dampers due to travel restrictions. In lieu of the vendor coming on site, as a mitigation, SCE worked with the vendor to conduct remote vibration dampers testing itself in lieu of the vendor traveling to SCE's service territory. SCE then configured and installed the large diameter conductor vibration dampers working with and using the materials provided by the vendor to stay on track for meeting this goal by year-end 2020.

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<p>Medium: Change in pre-COVID-19 completion date, but plan to meet WMP 2020 year-end Program Target</p>	<p>PSPS-4: Income Qualified Critical Care (IQCC) Customer Battery Backup Incentive Program² (Section 5.3.6.5.3)</p>	<p>Outreach to eligible customers (i.e., low income, critical care, and located in HFRA) to provide portable battery back-up solution. SCE has identified approximately 2,500 customers that it will target for the program in 2020 with efforts to begin second quarter.</p>	<p>Overseas manufacturing was temporarily shut down due to COVID-19 leading to equipment shortages. Additionally, a 300% increase in customer demand in March/April 2020 compared to 2019 also contributed to inventory shortages. SCE revised the battery procurement process to accelerate SCE's ability to place a battery order. The change moved away from a broad RFP to a focused RFQ that asked vendors to provide the cost of providing a single type of battery. The revised process launched in July 2020 with battery supply that would cover approximately 10% of the total estimated eligible population. SCE anticipates having a battery supply that would cover the full estimated eligible population by September 2020 and expects to meet the program target by year-end 2020.</p>
	<p>IN-6.1: Distribution Aerial Inspections (Section 5.3.4.9.2)</p>	<p>Inspect 165,000 structures in HFRA.</p>	<p>Safety concerns due to co-location of image inspectors caused delays. Contracts with Qualified Electrical Workers (QEWs) were suspended and all inspectors were released in mid-March 2020. Non-local resources returned home, slowing initial image capture.</p>
	<p>IN-6.2: Transmission Aerial Inspections (Section 5.3.4.10.2)</p>	<p>Inspect 33,500 structures in HFRA.</p>	<p>SCE has gradually onboarded resources with capabilities to inspect remotely. Also, SCE has on-boarded more local UAS image capture resources. SCE accelerated its image captures to mitigate against possible loss of crew availability for remediation.</p>
	<p>SA-5: Fuel Sampling Program (Section 5.3.2.4.2)</p>	<p>Perform updated fuel sampling in HFRA in areas deemed appropriate once every two weeks (weather permitting).</p>	<p>COVID-19 impacted the ability to travel with vendor to the Western Sierra Region in order to scope additional locations. SCE has established a plan to move forward with vendor to begin fuel sampling program in Western Sierras (last area in 2020 scope). Met with vendor in early August 2020 to discuss potential locations for sampling and allow vendor to begin sampling by early September 2020 taking COVID-19 restrictions into account, e.g., social distancing.</p>
	<p>DEP-2: Adequate and trained workforce for service restoration: SCE Emergency Responder Training (Section 5.3.9.1)</p>	<p>Hold SCE IMT member training on de-energization protocols, determine additional staffing needs and train, exercise and qualify new staff.</p>	<p>COVID-19 restrictions contributed to delays in having all PSPS IMT members perform the required trainings and exercises for 2020. Exercises were restructured from in-person to a virtual format. As of the end of July 2020, 95% of IMT members have completed both the required trainings and exercises. Plans to complete exercises for the remaining 5% are currently being determined. An interim team is</p>

² This program has since been renamed to Critical Care Backup Battery Program.

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			supporting any activations until all PSPS IMT and Task Force members have completed the required shadowing or exercise.
High: Ability to meet WMP year-end 2020 Program Target is in doubt due to COVID-19	OP-3: UAS Operations Training (Section 5.3.4.9.2.2)	Increase the number of UAS operators by an additional 50 crews.	Delays due to closure of Federal Aviation Administration (FAA) testing sites has restricted ability to take the UAS exam which must be taken on-site. Taking and passing this test is one of the steps needed to become a UAS operator. This, in turn, has reduced participant interest below program target level. As of July 2020, FAA testing centers began to open after being classified as an essential service. SCE has been working diligently to advance the current pool of candidates to sit for the FAA Part 107 Knowledge Test but given the long delay experienced between March and July, it's still at risk of not meeting the year-end program target.

If you have any questions, or require additional information, please contact me at carla.peterman@sce.com.

Sincerely,

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Carla Peterman
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Southern California Edison

cc: Service List for R.18-10-007
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