Order Instituting Rulemaking to Develop and Adopt Fire-Threat Maps and Fire-Safety Regulations.	Rulemaking 15-05-006

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) PETITION FOR MODIFICATION OF DECISION 17-12-024

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Dated: **August 19, 2019**

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Pursuant to California Public Utilities Commission (Commission or CPUC) Rule of Practice and Procedure 16.4, Southern California Edison Company (SCE) respectfully submits this Petition for Modification of Decision (D.) 17-12-024, the Commission's Decision Adopting Regulations to Enhance Fire Safety in the High Fire-Threat District (Petition). SCE seeks modification of D.17-12-024 (Decision) to align the Commission's High Fire-Threat District (HFTD) maps with SCE's internal High Fire Risk Area (HFRA) designations. It is crucial that objective risk-informed analysis remain the foundation of the Investor-Owned Utilities' (IOUs) wildfire risk mitigation actions. In this Petition, SCE seeks a modest expansion of the Commission's official fire maps to include specific, granular areas in SCE's service territory that, after careful analysis, SCE believes poses unacceptable wildfire risk to the customers and communities we are privileged to serve. This Petition is grounded in a vigorous, risk-informed analysis, as set forth in detail below. Further, this Petition aligns with the Commission's specific recent direction to SCE that "if the aforementioned [analysis] were to find that SCE's HFRA is

indeed better representative of areas with elevated or extreme fire risk, then SCE should ***seek an amendment*** to the HFTD map to include any such areas."[1]

This Petition follows.

I.

REGULATORY BACKGROUND

A.   The CPUC Adopted Specific High-Fire Threat Districts in D.17-12-024

D.17-12-024 put in place a series of policy and regulatory changes that affect how the utilities treat high fire threat areas within their respective service territories. At a high level, the Decision adopted the addition of an HFTD designation to General Order (GO) 95's various requirements, consisting of "Zone 1" (*i.e.*, tree mortality-associated high hazard zones), "Tier 2" (*i.e.*, elevated wildfire risk areas), and "Tier 3" (*i.e.*, extreme wildfire risk areas). The Decision imposed additional regulatory requirements and required the utilities to implement enhanced wildfire mitigation activities in these HFTD areas.

The Decision states "that the High Fire-Threat District Map will become effective upon the Commission's adoption of the CPUC Fire-Threat Map. The process for the Commission's review and adoption of the CPUC Fire-Threat Map is set forth in D.17-01-009 as modified by D.17-06-024."[2] The Decision also noted that the "[t]he CPUC Fire-Threat Map is currently in an advanced stage of development [and that the] CPUC Fire-Threat Map filed on November 17, 2017, provides a reasonable estimate for the size of the statewide Tier 2 and Tier 3."[3] On November 21, 2017, the Safety and Enforcement Division (SED) filed a summary report

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[1]   D.19-05-038 (emphasis added).
[2]   D.17-12-024, p. 130.
[3]   D.17-12-024, Finding of Fact #2, p.146.

detailing the production of the CPUC Fire-Threat Map.[4] On January 19, 2018 the CPUC adopted, via SED's disposition of a Tier 1 Advice Letter, the final CPUC Fire-Threat Map.[5]

B.   SCE's 2019 Wildfire Mitigation Plan (WMP) Addressed Areas Beyond the HFTD

Since the issuance of D.17-12-024, from an operational perspective SCE has maintained HFRA designations that were a combination of its historical map boundaries (based on past fire management and response experiences), CAL FIRE's Fire Hazard Severity Zone (FHSZ) maps, and most recently, the CPUC's HFTD map. SCE has considered Zone 1, Tier 2 and Tier 3 (collectively, the HFTD), and non-CPUC historical high fire risk areas, to collectively be "HFRA."

In the fall of 2018, SCE filed its Grid Safety & Resiliency Program (GSRP) application (A.18-09-002). In February of 2019, SCE submitted its 2019 WMP in Rulemaking (R.) 18-10-007 (the SB 901 WMP OIR). Both SCE's GSRP and 2019 WMP made explicit that from an operational perspective, SCE's internally-designated HFRA consisted of both (1) Commission-designated Tier 2 and Tier 3 HFTD from D.17-12-024's final fire maps (27% of SCE's service territory), as well as (2) areas outside of the HFTD that SCE traditionally considered to be at elevated risk of wildfires (8% of SCE's service territory) (cumulatively, 35%). As discussed in those proceedings, SCE initially included both of these areas as HRFA to retain a conservative approach from a risk perspective while a thorough analysis of the non-HFTD HRFA was pending.

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[4]   Independent Review Team Final Report on the Production of the CPUC's Statewide Fire Map 2, November 21, 2017. *Available at* http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M199/K508/199508442.PDF.

[5]   Advice Letter 52111-E/3172-E.

SCE's HFRA Designations (as of filing of 2019 WMP)

	Area (Square Miles)	Percent of Service Territory
Tier 3 of the HFTD-- Extreme Risk	4,708	9%
Tier 2 of the HFTD -- Elevated Risk	9,573	18%
SCE HFRA Not in HFTD	4,212	8%
Total	18,493	35%

SCE's WMP described how SCE has historically defined those areas collectively as its "HFRA," and how it has generally employed the same elevated wildfire threat mitigation strategies, standards, programs and activities in both CPUC-designated HFTD and non-CPUC HFRA. In other words, SCE has generally treated all its designated HFRA consistently, with appropriate risk-based prioritization of some areas over others for certain programs and activities. SCE's 2019 WMP also made clear that at the time of its submittal, SCE was in the process of conducting a rigorous review of its HFRA to review its non-HFTD HFRA areas to assess whether it was appropriate to either continue to classify each of those 1,141 granular sub-areas (known as "polygons") as HFRA. That analysis—*i.e.*, whether to "remove" or "retain" each non-CPUC-HFTD HFRA polygon—is now complete and is discussed in detail in Section III below and in Appendix C. From an operational perspective, SCE will treat "removed" areas as non-high-fire risk areas (i.e., all of the inspection and maintenance schedules and other programs aimed at HFRA will not apply to these areas). "Retained" areas will be treated as HFRA (i.e., all of the inspection and maintenance schedules and other programs aimed at HFRA will apply to these areas).

II.

RECENT COMMISSION GUIDANCE IN D.19-05-038 SUPPORTS THE GRANTING OF THIS PETITION

Despite no party in the SB 901 WMP OIR expressing any concerns about SCE's HFRA definition, the Commission made clear that it had reservations about SCE maintaining non-HFTD areas in its HFRA, stating:

- "It is not clear from SCE's WMP whether it continues to maintain an HFRA because it disagrees with the HFTD, or simply has not brought its own mapping into compliance with the HFTD requirements."[6]

- "SCE should not be allowed to work from two separate 'high fire threat' maps – SCE's own HFRA, and the Commission's HFTD – without justification and studies to support its own mapping, or independent vetting of HFRA for scientific rigor and reasonableness, as was done in R.15-05-006."[7]

- "It is important to understand that any regulations adopted in R.15-05-006 apply specifically to areas defined by HFTD tiers and would not equally apply to SCE-identified HFRA areas. Having this type of disjointed, self-imposed, unreviewed, and unclear definition of fire risk area unnecessarily complicates enforcement of fire safety regulations."[8]

In approving SCE's 2019 WMP in D.19-05-038, the Commission encouraged the filing of this Petition. Specifically, the Commission required that "[i]n next year's WMP, *or sooner if it wishes*, SCE should propose a process for bringing its HFRA in compliance with HFTD, or discuss in more detail why it should not be required to do so. It should also include its report on the outcome of the [analysis of non-CPUC-HFTD areas as compared to HFTD areas]."[9] The Commission further concluded that "if the aforementioned [analysis] were to find that SCE's HFRA is indeed better representative of areas with elevated or extreme fire risk, then SCE should *seek an amendment* to the HFTD map to include any such areas."[10]

In response to the Commission's direction, SCE submits this Petition, which includes a rigorous and granular analysis of each of the 43 polygons SCE proposes to retain in non-CPUC-HFTD HFRA areas based on an August 2019 final "SCE High Fire Risk Area (HFRA)

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[6] D.19-05-038 at p. 6.
[7] *Id.* at pp. 6-7.
[8] *Id.* at p. 7.
[9] *Id.* at p. 6 (emphasis added, footnotes omitted).
[10] *Id.* at p. 7 (emphasis added).

Evaluation" described below (Report). The Report is attached hereto as Appendix C, and a summary follows immediately below.

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III.

THE REPORT'S GRANULAR AND RIGOROUS ANALYSIS SUPPORTS ADDING LIMITED ADDITIONAL HIGH-RISK AREAS TO THE COMMISSION'S HFTD FIRE MAPS

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A.   Overview of Process Leading to the Report

In the fall of 2018, a team consisting of SCE employees with subject matter expertise in fire management/response, fire behavior/fuels, meteorology, maintenance/inspection, grid operations, vegetation management, and geospatial analysis began a project to evaluate these non-CPUC HFRA polygons. Collectively, this team spent hundreds of hours conducting its analysis, meeting weekly, reporting to a senior management oversight team regularly, and briefing and receiving approval from senior executives.

B.   Polygons SCE Proposes to "Retain" as HFRA

As detailed in the Report, SCE proposes to <u>retain</u> approximately 1% of the surface area associated with non-CPUC-HFTD polygons as SCE HFRA (*i.e.*, 1% of the 8% constituting SCE's non-CPUC-HFTD HFRA service territory (40 polygons in SCE's service territory and 3 polygons outside of SCE's service territory)),[11] as set forth on pages 5-88 of the Report attached hereto as Exhibit C. Specifically, the Report includes, for each of these 43 polygons:

- **A satellite-based geographic information system (GIS) geospatial map.** The

    maps show in color an overlay of overhead electrical equipment, HFTD areas

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[11]   SCE also reviewed the non-HFTD HFRA polygons that have SCE equipment located within their boundaries but which are not within SCE's service territory. SCE concluded that three of those polygons (841, 785, and 999) should be retained as HFRA. The three polygons are in addition to the 40 total retained polygons in SCE's service territory.

(e.g., orange is Tier 2, red is Tier 3), non-HFTD HFRA (*i.e.*, the polygon at issue), and historical fires.

- **Results of wildfire simulations.** SCE hired a third-party expert engineering firm to run a fire-risk simulation in the vicinity of overhead lines that run through the HFRA.[12] The Monte Carlo-based modeling (run hundreds of thousands of times) simulated fire ignition points randomly selected within 100 meters of overhead electric facilities, and relied on several inputs including fuel, topography, housing density, historical fires, and extreme fire weather conditions over the last 20 years. The results considered both the likelihood and consequences of potential ignition events and consist of computed risk scores for each simulation within a polygon where overhead infrastructure is present or in close proximity. Some polygons reviewed did not have any simulations due to the absence of overhead infrastructure.

  The simulation ultimately produced a "maximum risk score" corresponding to the simulation within a polygon that had the highest risk score and compared it to the "mean risk score" of all simulations contained within SCE's Tier 2 HFTD. These wildfire simulation results were used as further validation of and comparisons to the initial recommendation from subject matter experts. When a polygon's maximum risk score exceeded the mean risk score for Tier 2, or when known local conditions indicated it was appropriate to do so, SCE carefully considered retaining the polygons as HFRA. In some cases, SCE decided not to retain polygons with maximum risk scores exceeding the Tier 2 mean risk threshold. SCE made these determinations on a case-by-case basis considering factors such as lack of ignition sources or overhead equipment, or because expert local

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[12] The engineering firm, Reax Engineering, is one of the premier fire engineering and risk modeling consulting firms in the country and participated in the creation of the Commission's 2017 HFTD maps.

judgment concluded that they were low risk (in line with the CPUC's earlier determination to exclude them from the official fire maps in the first place). For 14 polygons, SCE decided to retain them as HFRA even though their maximum risk score did not exceed the Tier 2 mean risk threshold, based on specific known local conditions (including wind speed and direction) and historical fire events.[13] The specific breakdown of the 1,141 evaluated polygons is as follows:

Risk Simulation Scores	Number of Polygons	Number of Polygons	Number of Polygons
	Total	Exclude	Retain
Polygon Max Score Lower than Tier 2 Mean	448	434	14
Polygon Max Score Higher than Tier 2 Mean	152	124	28
No Simulation Data Results for Polygon	541	540	1
Grand Totals	1,141	1,098	43

The Report also includes the following information for each retained polygon, all of which is relevant to the risk analysis.

- **Electrical facilities description.** The Report contains an accounting of the length of overhead and underground circuit miles for both transmission- and distribution-level equipment for each of the retained polygons.

- **Historical fire information.** The Report enumerates the previous fires experienced in each of the retained polygons since 2000 (and their most recent fires, if applicable).

- **Vegetation management activity.** The Report sets forth the number of identified trees needing trimming in the area (which indicates how active the vegetation management is in the area).

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[13] *See, e.g.*, Polygon ID #5 (Avalon, Catalina Island).

- **Tree mortality area designation.** The Report also identifies whether or not the retained polygon contains tree mortality areas.
- **Fuel sources.** The report contains a list of vegetation fuel types within each retained polygon.
- **Conclusions.** The Report sets forth clear justifications for SCE's HFRA retention decision for each retained polygon.

C.   <u>Polygons SCE Proposes to "Exclude" from HFRA</u>

SCE proposes to <u>exclude</u> approximately 99% of the area contained within non-CPUC-HFTD polygons from SCE HFRA (*i.e.*, 99% of the 8% constituting SCE's non-CPUC-HFTD HFRA service territory). These polygons are not set forth in the Report because SCE is not proposing to retain them as HFRA.

D.   <u>The Report's Final Conclusions About Polygons to "Retain" or "Exclude" from HFRA</u>

The cumulative effect of SCE's proposal to retain the less than 1% of the area associated with non-CPUC-HFTD polygons, and to exclude the other 99%, is set forth in the chart below:

SCE's Proposed HFRA/HFTD Designations

	Area (Square Miles)	Percent of Service Territory
CPUC Tier 3 -- Extreme Risk	4,708	9%
CPUC Tier 2 -- Elevated Risk	9,571[14]	18%
SCE HFRA Not in CPUC Tiers	124	0.2%
Total	14,403	27.2%

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[14]   The difference between the 9,571 square mile number in this table and the 9,573 square mile number in the table above is due to a data discrepancy error in the original table.

IV.

REQUEST FOR RELIEF

A.   SCE Requests Minor Alterations to the Commission's HFTD Fire Maps

This Petition requests that, as soon as reasonably practical, the Commission formally incorporate into Tier 2 of the HFTD map the specific polygons set forth in the Report (Appendix C). While SCE's proposed changes may appear relatively minor (and the additional proposed HFTD square mileage is undoubtedly modest), it is critical that the Commission's official fire maps and the utilities' operational practices reflect the most up-to-date and granular risk-informed analyses.

B.   This Petition is Timely

The Commission's Rules require that unless a Petitioner "explain[s] why the petition could not have been presented within one year of the effective date of the decision" that "a petition for modification must be filed and served within one year … ."[15] D.17-12-024 became effective in December of 2017. As discussed above and in the accompanying declaration[16] of SCE Managing Director of Grid Modernization and Resiliency Bill Chiu (Appendix A hereto),[17] the Report that led to this Petition was not completed until mid-2019, as previewed in SCE's 2019 WMP[18] and in AL 4030-E. Indeed, SCE did not begin this analysis until almost a year after D.17-12-024 became effective.

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[15] Rule 16.4(d).
[16] *See* Rule 16.4(b).
[17] Rule 16.4(b) requires that "[a]llegations of new or changed facts must be supported by an appropriate declaration or affidavit."
[18] *See* February 6, 2019 SCE WMP at pp. 28-32.

C.   SCE's Specific Proposed Wording Changes to D.17-12-024

Rule 16.4(b) requires that "[a] petition for modification of a Commission decision must concisely state the justification for the requested relief and must propose specific wording to carry out all requested modifications to the decision."[19] SCE's detailed justification for the proposed changes to D.17-12-024 is described above. SCE's specific proposed wording changes to the Decision are set forth in Appendix B hereto. The appended Declaration of Bill Chiu does so. As an alternative to SCE's proposal in this Petition, SCE is also amenable to the Commission considering this issue through the forthcoming 2020 WMP process. Whichever procedural route the Commission ultimately chooses to adopt, however, it is important to note that in the interim, from an operational perspective, SCE is continuing to treat the approximately 1% of the area associated with retained non-CPUC-HFTD polygons as HFRA Tier 2 pursuant to the Report's final conclusions.[20]

Respectfully submitted,

FADIA RAFEEDIE KHOURY
RUSSELL A. ARCHER

_____
                            /s/ Russell A. Archer
  By: Russell A. Archer

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August 19, 2019

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[19] Rule 16.4(b).
[20] *See also* July 5, 2019 AL 4030-E.

Appendix A

DECLARATION OF BILL CHIU

I, Bill Chiu, declare as follows:

1. I am the Managing Director of Grid Resiliency Program Management Office in Southern California Edison Company's (SCE) Transmission & Distribution Business Unit (T&D). In my role, I report directly to T&D Senior Vice President Phil Herrington.

2. In my business role, I had overall management responsibility for the commissioning and oversight of the analysis that led to the report attached as Exhibit C to this Petition for Modification (Report).

3. Since the issuance of Commission Decision (D.)17-12-024, which established the Commission's official High Fire Threat District (HFTD) fire maps, SCE has internally designated its High Fire Threat Areas (HFRA) as consisting of both (1) Commission-designated Tier 2 and Tier 3 HFTD from D.17-12-024's final fire maps (27% of SCE's service area), as well as (2) areas outside of the HFTD that SCE traditionally considered to be at elevated risk of wildfires (an additional 8% of SCE's service area for a cumulative total of 35% of SCE's service area). Although SCE's ultimate intent was to bring its HRFA and the Commission's official HFTD into alignment to the extent possible, SCE initially included both of these areas as HFRA as an additional measure of prudency from a risk perspective while a thorough analysis of the non-HFTD HRFA was pending.

4. In the fall of 2018, a team under my direction consisting of SCE employees with subject matter expertise in fire management/response, fire behavior/fuels, meteorology, maintenance/inspection, grid operations, vegetation management, and geospatial analysis began the thorough analysis evaluating these non-CPUC HFRA polygons.

5. The team also engaged Reax Consulting, one of the nation's leading fire engineering consulting firms, to assist SCE in conducting a risk-based, granular analysis on the individual sub-areas (known as "polygons") that SCE has traditionally maintained as

HFRA that are not included in the Commission's official HFTD fire maps. The Reax risk-simulation ran a fire-risk simulation in the vicinity of overhead electrical lines that run through the HFRA.[1] The Monte Carlo-based modeling (run hundreds of thousands of times) simulated fire ignition points randomly selected within 100 meters of overhead electric facilities, and relied on several inputs including fuel, topography, housing density, historical fires, and extreme fire weather conditions over the last 20 years. The results considered both the likelihood and consequences of potential ignition events and consist of computed risk scores for each simulation within a polygon where overhead infrastructure is present or in close proximity. Some polygons reviewed did not have any simulations due to the absence of overhead infrastructure.

6. Collectively, this HFRA evaluation team spent hundreds of hours conducting its analysis, meeting weekly, reporting to a steering team regularly, and briefing and receiving approval from senior leadership. Each polygon was evaluated using a variety of criteria including presence of overhead assets, level of development/urbanization, vegetation density/type, typical wind speed, fire history, and fire simulation consequence study results. In addition to the subject matter expertise of the evaluation team, SCE also took in the additional criteria from the Reax simulations that ultimately produced a "maximum risk score" corresponding to the simulation within a polygon that had the highest risk score and compared it to the "mean risk score" of all simulations contained within SCE's Tier 2 HFTD. When a polygon's maximum risk score exceeded the mean risk score for Tier 2, or when known local conditions indicated it was appropriate to do so, SCE carefully considered retaining the polygons as HFRA.

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[1] The engineering firm, Reax Engineering, is one of the premier fire engineering and risk modeling consulting firms in the country and participated in the creation of the Commission's 2017 HFTD maps.

7. The fire risk simulation exercise led to the issuance of the final Report in August of 2019. SCE made its polygon-specific decisions on a case-by-case basis based in part on the risk scores resulting from the risk simulation but also based on factors such as lack of ignition sources or overhead equipment as well as known local conditions.

8. Overall, based in part on the Reax risk simulations, and as informed by SCE's expert judgment taking into account known local conditions for each polygon, SCE is proposing to retain as HFRA (from an operational perspective) 43 of the 1,141 non-HFTD polyons, and to exclude from HFRA (from an operational perspective) 1,098 of those polygons.

9. In this Petition for Modification, SCE respectfully requests the Commission modify its official HFTD fire maps to include the 43 specific polygons discussed in the Report. If the Commission agrees with this proposal, collectively this will only add 124 square miles to the official HFTD maps.

10. Although these changes may seem small (and the amount of proposed added HFRA area is undeniably modest), it is important that the Commission's official fire map be aligned with objective, risk-informed analysis in order to protect public safety by mitigating elevated wildfire risk.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 19th day of August 2019 in Rosemead, California.

/s/ Bill Chiu
Bill Chiu

Appendix B

PROPOSED WORDING CHANGES TO D.17-12-024

Findings of Fact

8 a. (new): <u>On August 19, 2019, Southern California Edison submitted a Petition for Modification in the docket that identifies certain additional areas where there is heightened risk for wildfires. Exhibit C to SCE's Petition for Modification constitutes a granular, risk-based analysis of these specific additional areas.</u>

Conclusions of Law

10 a. (new): <u>Southern California Edison's Petition for Modification should be granted. Accordingly, the High-Fire Threat District Map shall be amended to include the additional areas identified in Exhibit C of Southern California Edison's August 19, 2019 Petition for Modification as "Tier 2 Elevated" areas.</u>

<u>Ordering Paragraphs</u>

13 (new): <u>Southern California Edison's Petition for Modification is hereby granted. Accordingly, the High-Fire Threat District Map is hereby amended to include the additional areas identified in Exhibit C of Southern California Edison's August 19, 2019 Petition for Modification as "Tier 2 Elevated" areas. Within 90 days of the issuance of this order, the Commission's Safety and Enforcement Division shall post a copy of the revised High-Fire Threat District map reflecting these changes on SED's section of the Commission's website and make other relevant updates to official Commission records.</u>

Appendix C

SCE High Fire Risk Area (HFRA) Evaluation

Retained Non-CPUC HFRA Final Report

SCE High Fire Risk Area (HFRA) Evaluation
Retained Non-CPUC HFRA Final Report

August 19, 2019

Contents

TERMINOLOGY

(A) City Name – Polygon Identification Number

(B) Image of the retained polygon outlined in teal

(C) Results of the Reax Engineering wildfire consequence simulation.

- No. of Samples: the number of simulation results within the polygon

- Max Risk Score: maximum risk score corresponds to the simulation within a polygon that had the highest risk score

- Max Risk $\geq$ 1225: 1,225 is the mean Reax risk score for all simulations within HFTD Tier 2. When a polygon's maximum risk score exceeded the mean risk score for Tier 2 it was categorized as "High Risk"

(D) Approximate primary circuit miles within the polygon

- OH Distribution Circuit Miles: Approximate distribution (4kV-33kV) overhead primary circuit miles within the polygon

- UG Distribution Circuit Miles: Approximate distribution (4kV-33kV) underground primary circuit miles within the polygon

- OH Subtransmission Circuit Miles: Approximate subtransmission (33kV – 115kV) overhead primary circuit miles within the polygon

- OH Transmission Circuit Miles: Approximate transmission (200kV – 500kV) overhead primary circuit miles within the polygon

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Ⓔ Criteria used for qualitative analysis

- No. of Previous Fires: The number of fires that occurred within the polygon since 2000

- List of Previous Fires: Lists all fires that occurred within the polygon since 2000, including the year the fire occurred and the fire name

- Tree Trimming Counts: Identifies the number of trees that require trimming within the polygon; this is an indicator of how active SCE vegetation management is in this area

- Tree Mortality Areas?: Identifies "Yes" or "No" if there are areas within the polygon intersecting with HFTD Zone 1 tree mortality zones

- List of Fuels within the Polygon: 2015 CAL FIRE vegetation layer which provides a list of vegetation fuel types within the polygon
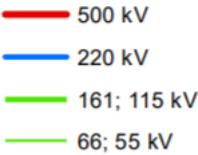
Ⓕ Provides list of justifications for including the polygon in HFTD Tier 2

- Supporting Picture(s) may be provided in cases where the aerial map is not particularly representative of the Tier 2 inclusions reasons. For example, the Tier 2 inclusion reasons describe moderate vegetation directly under the overhead circuitry, but the aerial map does not represent this description. Images of the street view may be included to support the inclusion reasons.
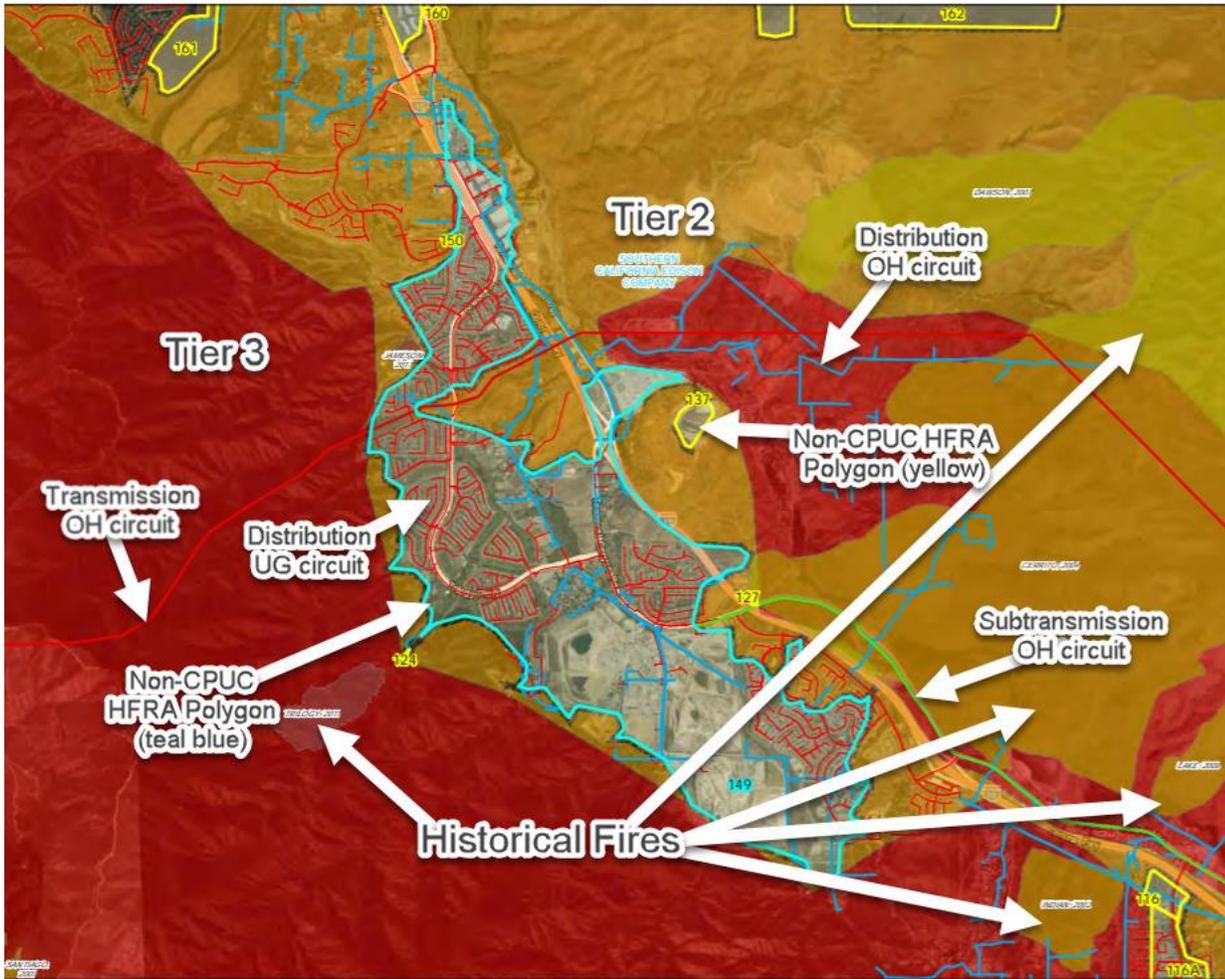
Legend Description

This document needs to be viewed in full color in order to properly identify the tiers, circuit types, and historical fires.

Section of Map Legend	Description
BL322 Fallout Polygons (Highlight) BL322 Fallout Polygons	The preexisting SCE high fire risk areas that fell outside of the CPUC HFTD map are referred to as "BL322 Fallout Polygons". "BL322" refers to the SCE System Operating Bulletin 322 which defines operating restrictions and procedures for high fire risk areas. • The teal blue outlined polygon will refer to the retained polygon that is being described on the page • Yellow outlined polygons identify other BL322 areas that may or may not have been retained; data described on the page do not refer to these yellow polygons

| Section of Map Legend	Description
cGIS Distribution Circuit —— Overhead Primary Conductor —— Underground Primary Cable	• Cerulean blue line: This identifies primary distribution overhead conductor using Consolidated Geospatial Information System (cGIS) software • Thin candy apple red line: This identifies primary distribution underground conductor using Consolidated Geospatial Information System (cGIS) software
cGIS Trans / Sub Trans —— 500 kV —— 220 kV —— 161; 115 kV —— 66; 55 kV	This section of the legend identifies subtransmission and transmission overhead conductor • Thick brick red line - 500kV: bulk transmission overhead line • Navy blue line – 220kV: bulk transmission overhead line • Thick neon green line – 161kV; 115 kV: subtransmission overhead line • Thin neon green line – 66kV; 55kV: subtransmission overhead line
SCE Territory	This blue highlighted, dotted line identifies the SCE service territory boundary. SCE does have circuitry outside of its territory. High fire risk areas outside of SCE territory were included in the review.
Historical Fires (Cal Fire) > 2000 **Year** ▇ 2000-2008 ▇ 2009-2018	This section of the legend identifies historical fires that occurred since the year 2000. This data was provided by CAL FIRE. • Yellow: Fires that occurred between 2000 and 2008 • Red: Fires that occurred between 2009 and 2018
CPUC -HFRA (with Buffer) ▢ Tier 2 ▨ SCE T2 200 Ft. Buffer ▢ Tier 3 ▨ SCE T3 200 Ft. Buffer	This section of the legend identifies the CPUC HFTD Tiers and the SCE 200' buffer. The 200' buffer was created along the borders between CPUC HFTD Tier 2/3 areas and SCE non-HFRA and SCE's BL322 areas (non-CPUC HFRA). The buffer abuts the CPUC HFTD but is not included when tier 2 abuts tier 3. • Mustard yellow: CPUC HFTD Tier 2 • Dashed mustard yellow: SCE 200' Tier 2 buffer • Red: CPUC HFTD Tier 3 • Dashed red: SCE 200' Tier 3 buffer
BL322 Polygon: **1**	This section of the legend identifies the SCE polygon number. Polygons were divided by SCE district and California zip code.

Section of Map Legend	Description
	• In this example the polygon identifier is the number 1

Annotated Map Example

Inyo County
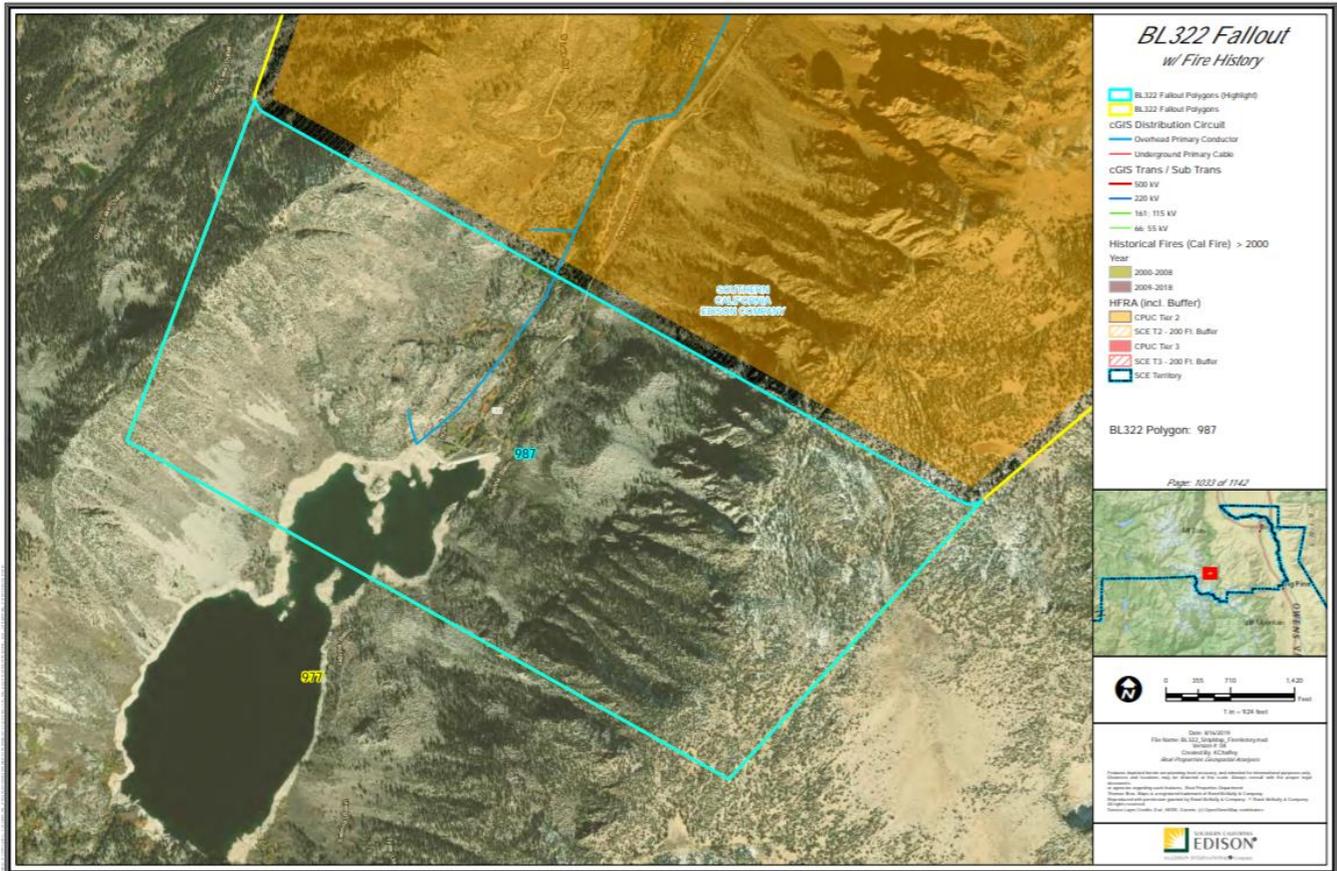
C-8

Bishop - Polygon ID #987

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
77	20	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.54	0.00	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
21	Yes	BARREN/OTHER,CONIFER,HARDWOOD,SHRUB,WATER

Bishop - Polygon ID #987 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:
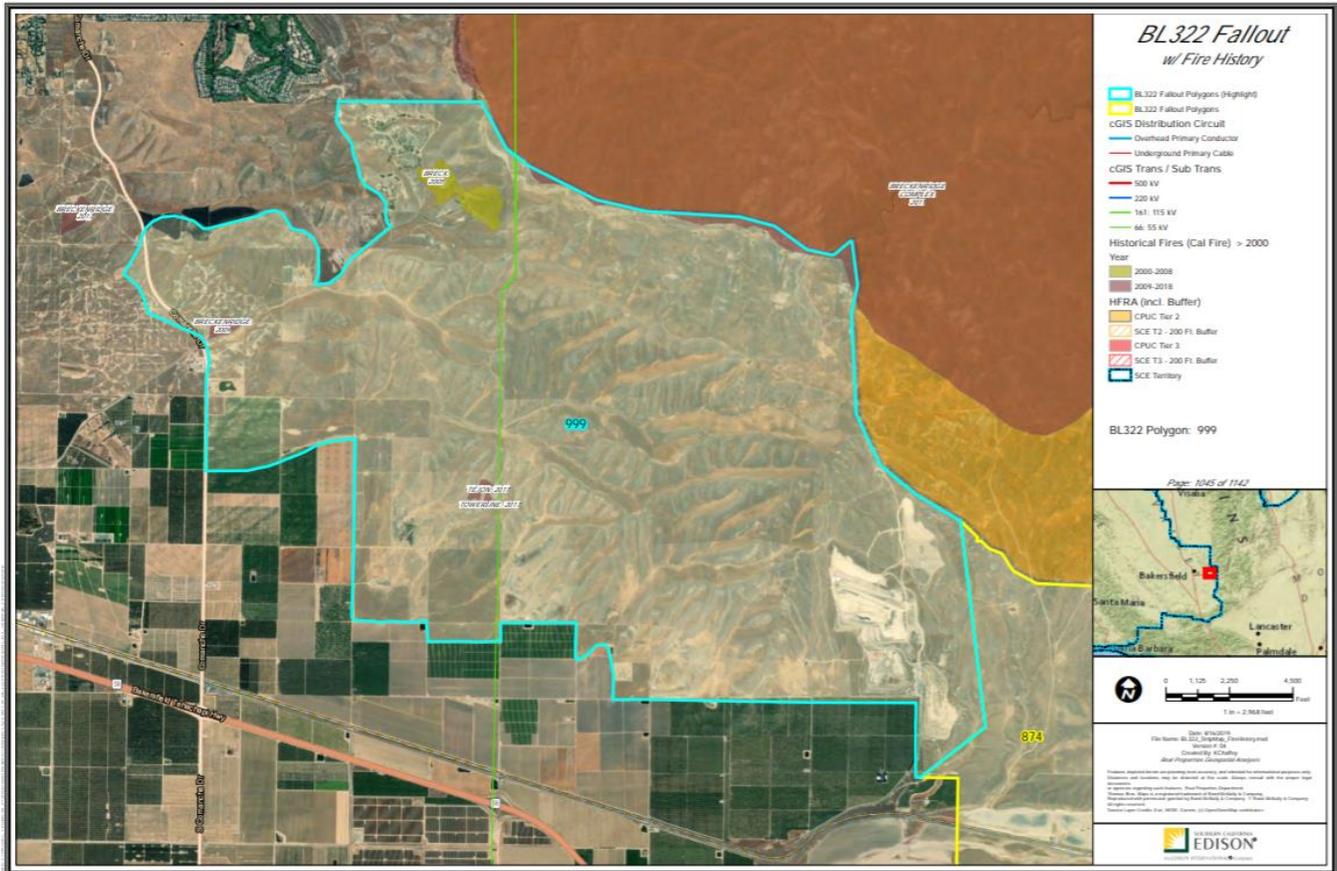
- Ingress and egress in this area for both fire suppression and evacuation is limited to one way in/out
- Frequent high winds that blow north into adjacent Tier 2 area
- Dense vegetation directly under overhead line in some areas
- Tree mortality areas identified near overhead distribution line

Supporting Picture(s)

[Kern County](#)

Bakersfield - Polygon ID #999

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk >1225?
377	113,898	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.00	0.00	4.25	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires		
5	2005 Breck, 2009 Breckenridge, 2011 Breckenridge Complex, 2017 Tejon, 2017 Towerline		
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)	
0	No	AGRICULTURE,BARREN/OTHER,HERBACEOUS,WATER	

Bakersfield - Polygon ID #999 Tier 2 Inclusion Reasons

- Significant fire history within this corridor; there were five within the polygon and additional fires in adjacent areas (2001 Choctaw, 2003 Caliente, 2005 Breck, 2005 Ridge, 2009 Breckenridge, 2011 Breckenridge Complex, 2011 Cattle, 2017 Tejon, 2017 Towerline)
- Overhead circuitry directly above two previous fires
- High wildfire consequence simulation risk scores

Supporting Picture(s)

2011 Brecken Ridge Complex Fire Area

Lebec - Polygon ID #515

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
418	2,264	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
1.37	0.02	3.86	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
1	2005 Gorman	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
23	No	BARREN/OTHER,HARDWOOD,HERBACEOUS,SHRUB,URBAN,WATER

Lebec - Polygon ID #515 Tier 2 Inclusion Reasons

- High wind area
- Surrounded by Tier 2 with moderate fuel growth potential
- Presents burn-in risk
- Significant fire history in areas adjacent to this polygon (2003 Tejon, 2005 Gorman, 2005 Crane, 2005 Spring, 2006 Arco, 2006 Quail Fire, 2008 Soda, 2009 School, 2010 Post, 2012 Lancer, 2013 Grand, 2015 Grape)
- High wildfire consequence simulation risk scores

Pine Mountain Club - Polygon ID #514

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
177	20,771	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

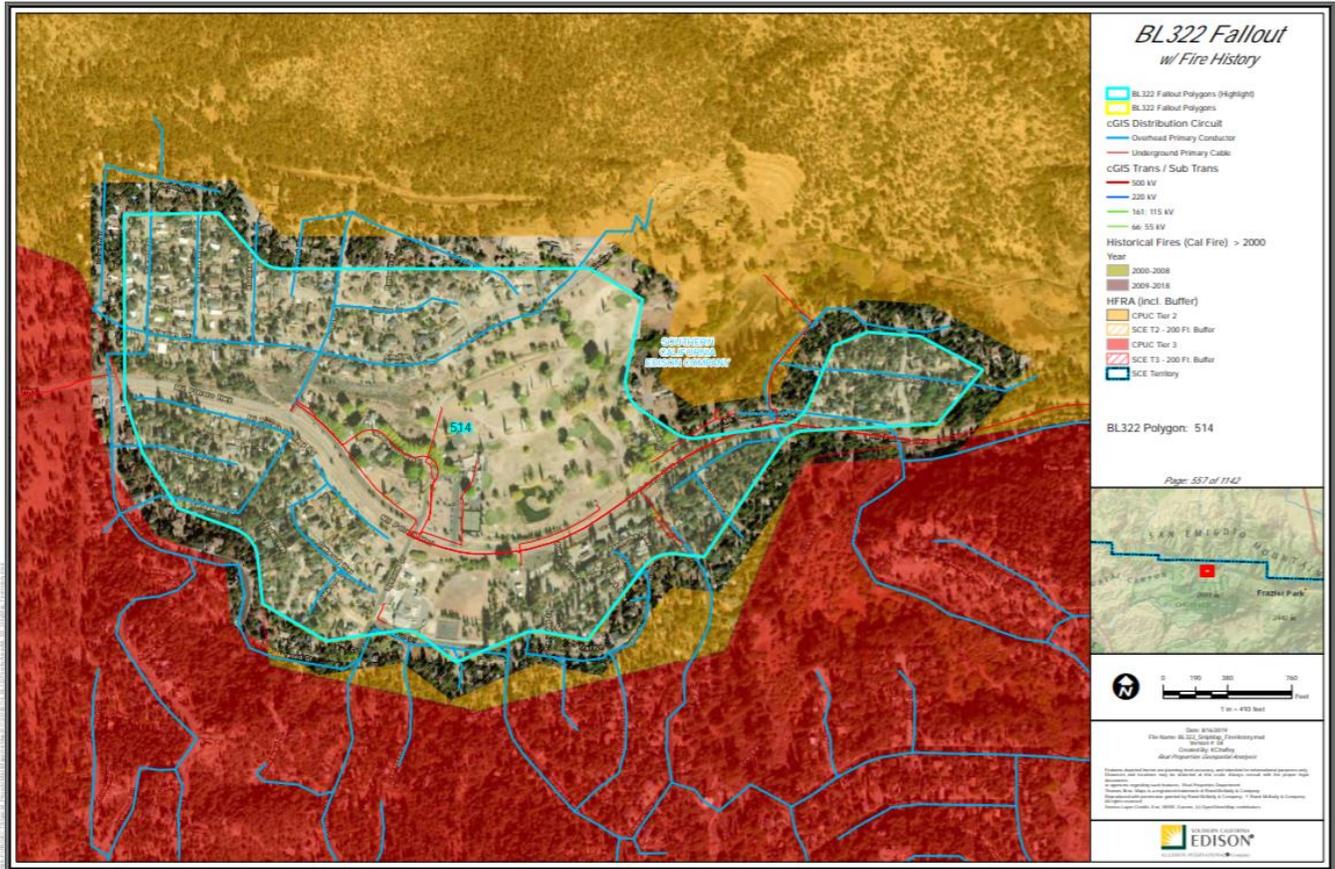| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
2.87	2.45	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
154	Yes	CONIFER,HARDWOOD,HERBACEOUS,SHRUB,URBAN,WATER

C-16

Pine Mountain Club - Polygon ID #514 Tier 2 Inclusion Reasons

- Moderate to high vegetation density
- Surrounded by Tier 2 and Tier 3 with moderate fuel growth potential
- Presents burn-in risk
- Large areas of tree mortality
- High wildfire consequence simulation risk scores

Supporting Picture(s)

Los Angeles County

Avalon - Polygon ID #5

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
3	0	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

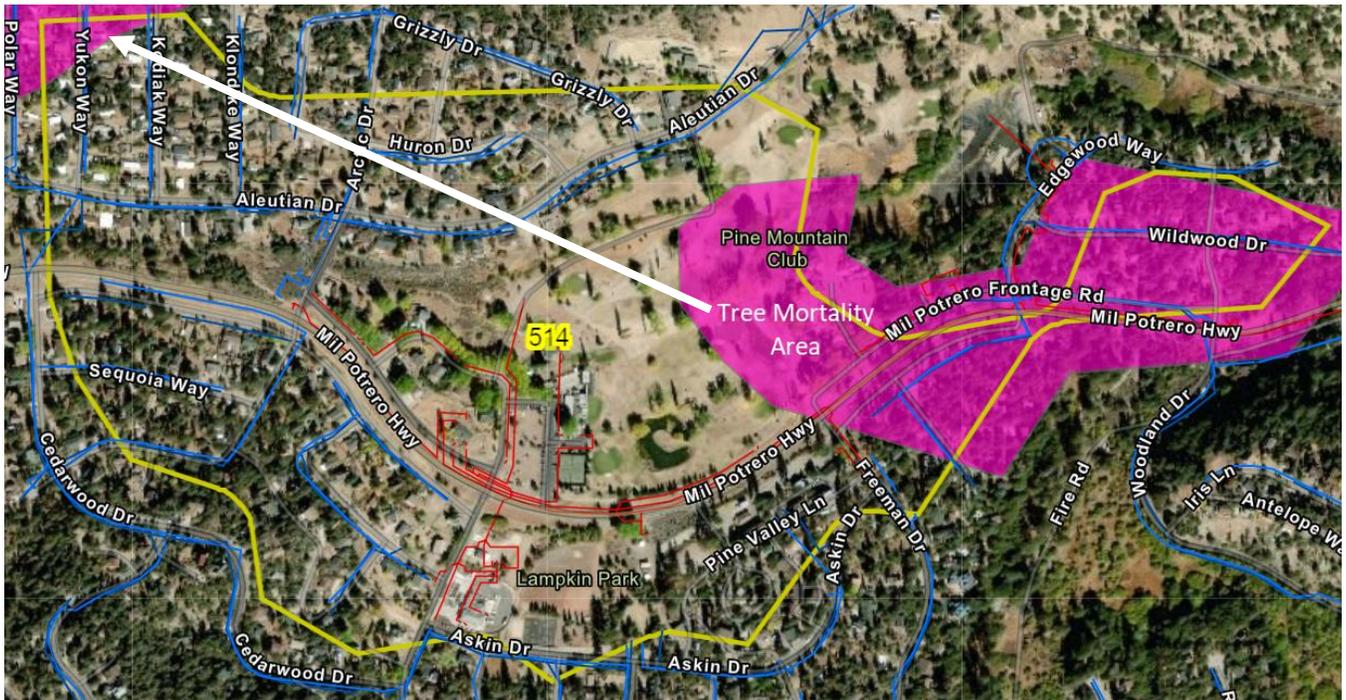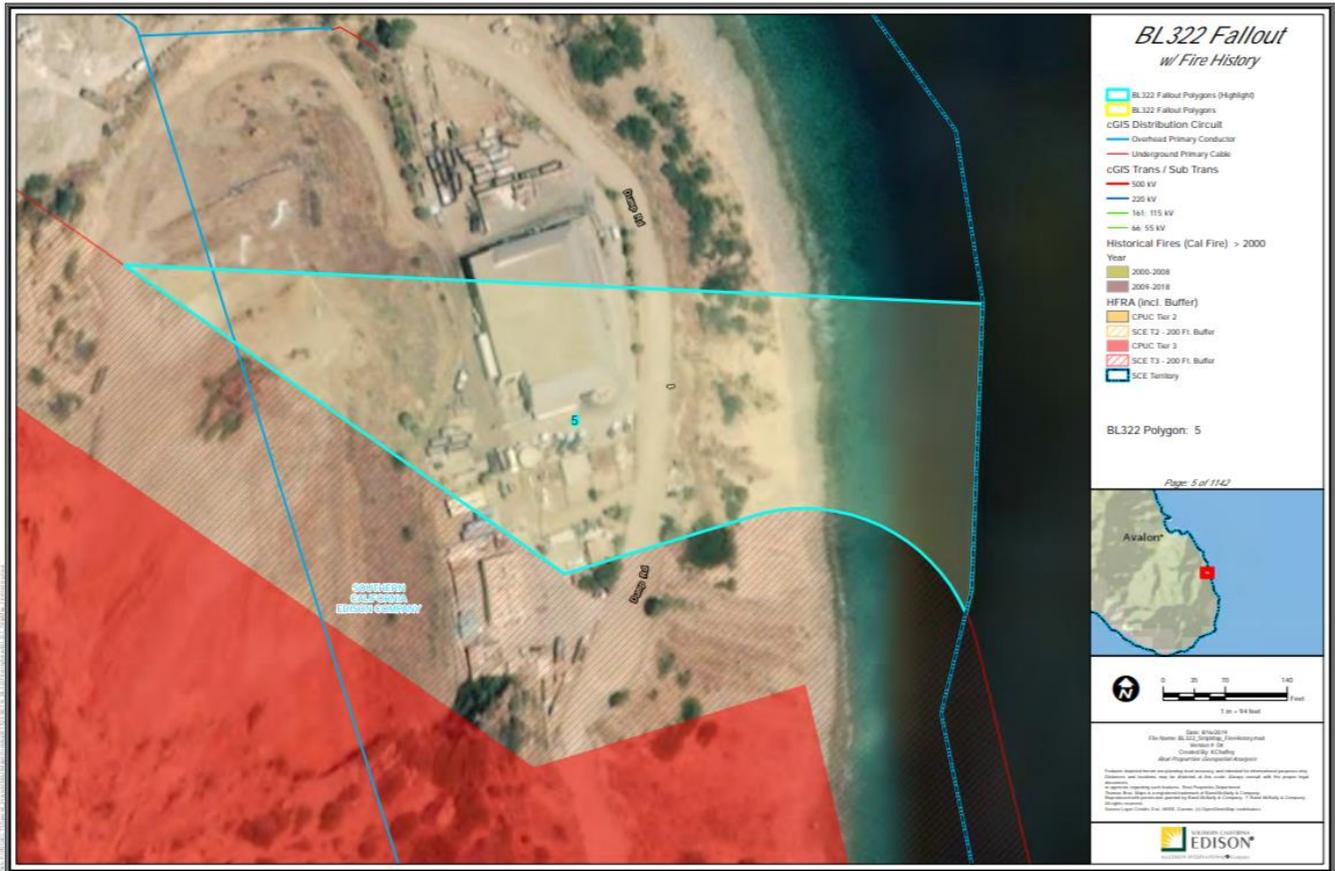| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.02	0.03	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires		
0	N/A		
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)	
0	No	BARREN/OTHER,HERBACEOUS,SHRUB,URBAN,WATER	

Avalon - Polygon ID #5 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:

- Remote area, isolated limited initial attack fire resources on the island
- The polygon is mostly barren, however there is very heavy brush approximately 150' west of the Hi Line 12kV
- Potential for wind-driven fire to carry into the city of Avalon
- Previously submitted to the CPUC for Tier 2 inclusion

Diamond Bar - Polygon ID #313
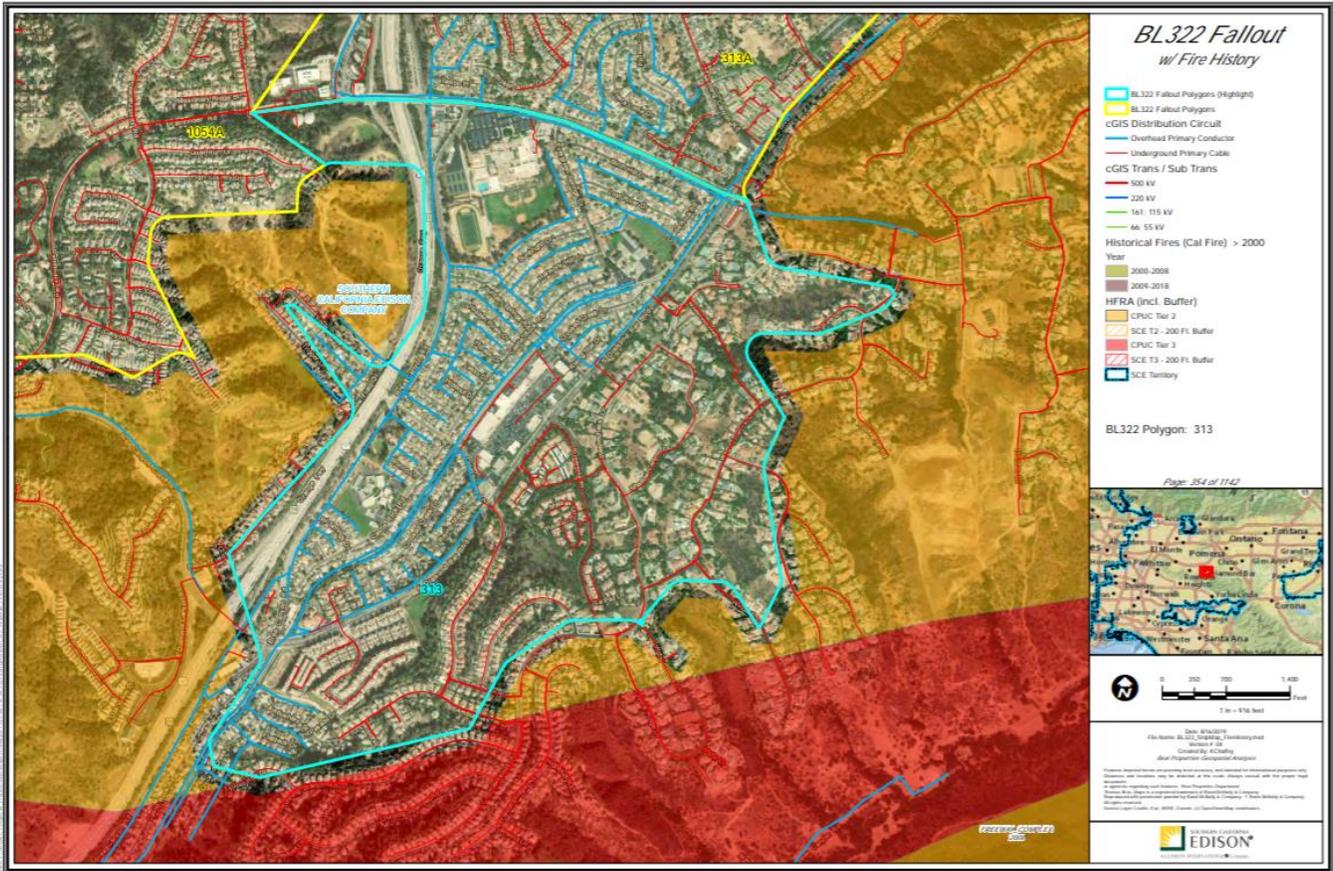
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
517	33	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
9.58	10.66	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
732	No	BARREN/OTHER,HARDWOOD,HERBACEOUS,SHRUB,URBAN

Diamond Bar - Polygon ID #313 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:

- High vegetation density
- Wind blows from the northeast, potential for flying sparks or embers to blow into the adjacent Tiers 2 and Tier 3 areas
- High probability to propagate into the hills
- Previously submitted to the CPUC for Tier 2 inclusion

Glendora - Polygon ID #1018
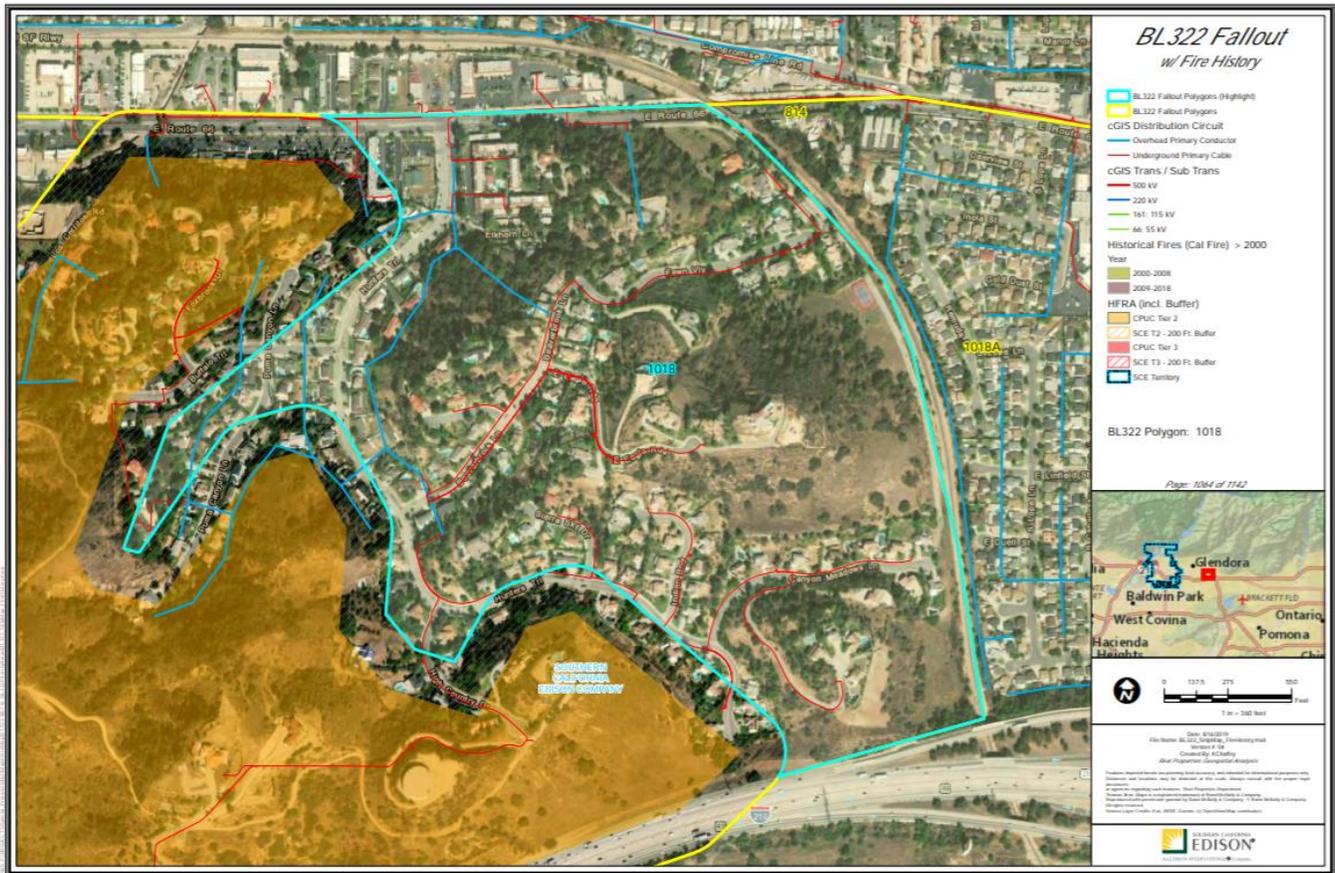
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
104	48	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.81	2.60	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
51	No	AGRICULTURE,BARREN/OTHER,HARDWOOD,HERBACEOUS,SHRUB,URBAN

Glendora - Polygon ID #1018 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:

- Primarily hillside homes
- Subject to both northerly and Santa Ana winds
- Fire spread potential into the hills
- Previously submitted to the CPUC for Tier 2 inclusion

La Crescenta-Montrose - Polygon ID #841
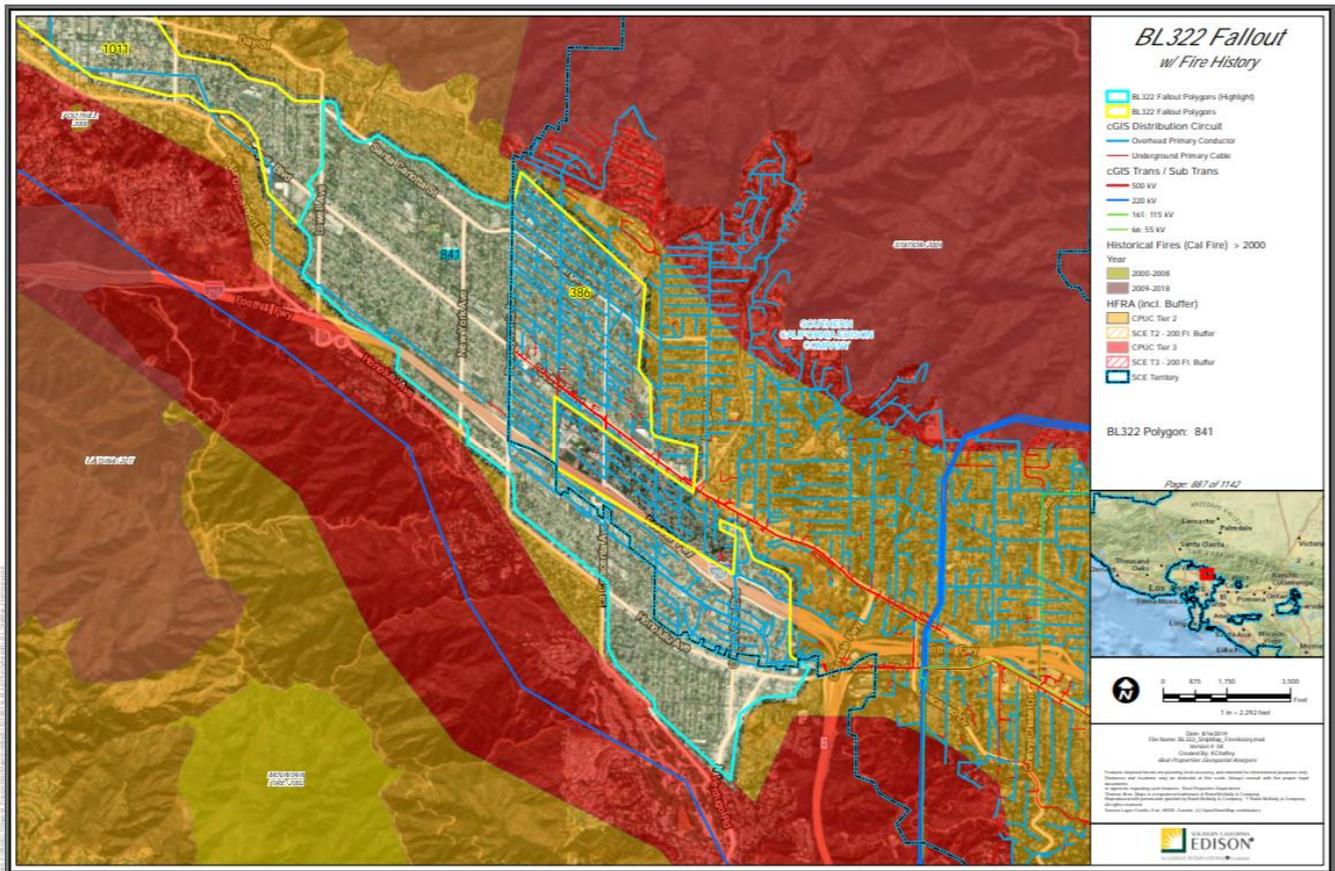
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
403	6,170	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
4.82	0.13	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
215	No	URBAN

La Crescenta-Montrose - Polygon ID #841 Tier 2 Inclusion Reasons

- Heavy vegetation in the foothills
- Moderate Santa Ana wind area, potential for flying sparks or embers to blow into the adjacent Tier 2 and Tier 3 areas
- Moderate fire history in adjacent areas
- High wildfire consequence simulation risk scores

Mono County

June Lake - Polygon ID #974

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
128	11	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.98	0.00	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires		
0	N/A		
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)	
26	Yes	BARREN/OTHER,CONIFER,HARDWOOD,HERBACEOUS,SHRUB,WATER	

June Lake - Polygon ID #974 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:

- Dense vegetation
- High wind area
- Small pockets of tree mortality areas identified, one near the overhead distribution circuit
- The Agnew 4kV line in this polygon is built on towers with relatively low clearance; there is currently a project underway to replace this line, but until the project is complete the recommendation is to retain the area

Supporting Picture(s)
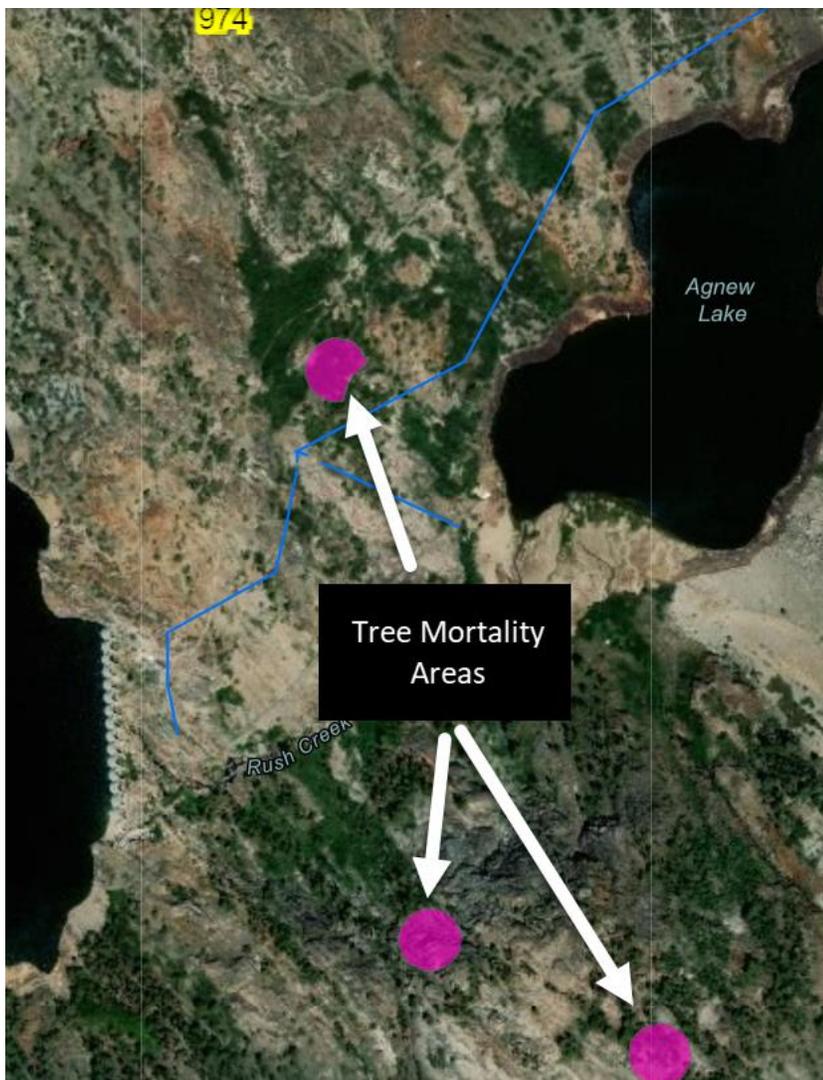
Mammoth Lakes - Polygon ID #983

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
81	3	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

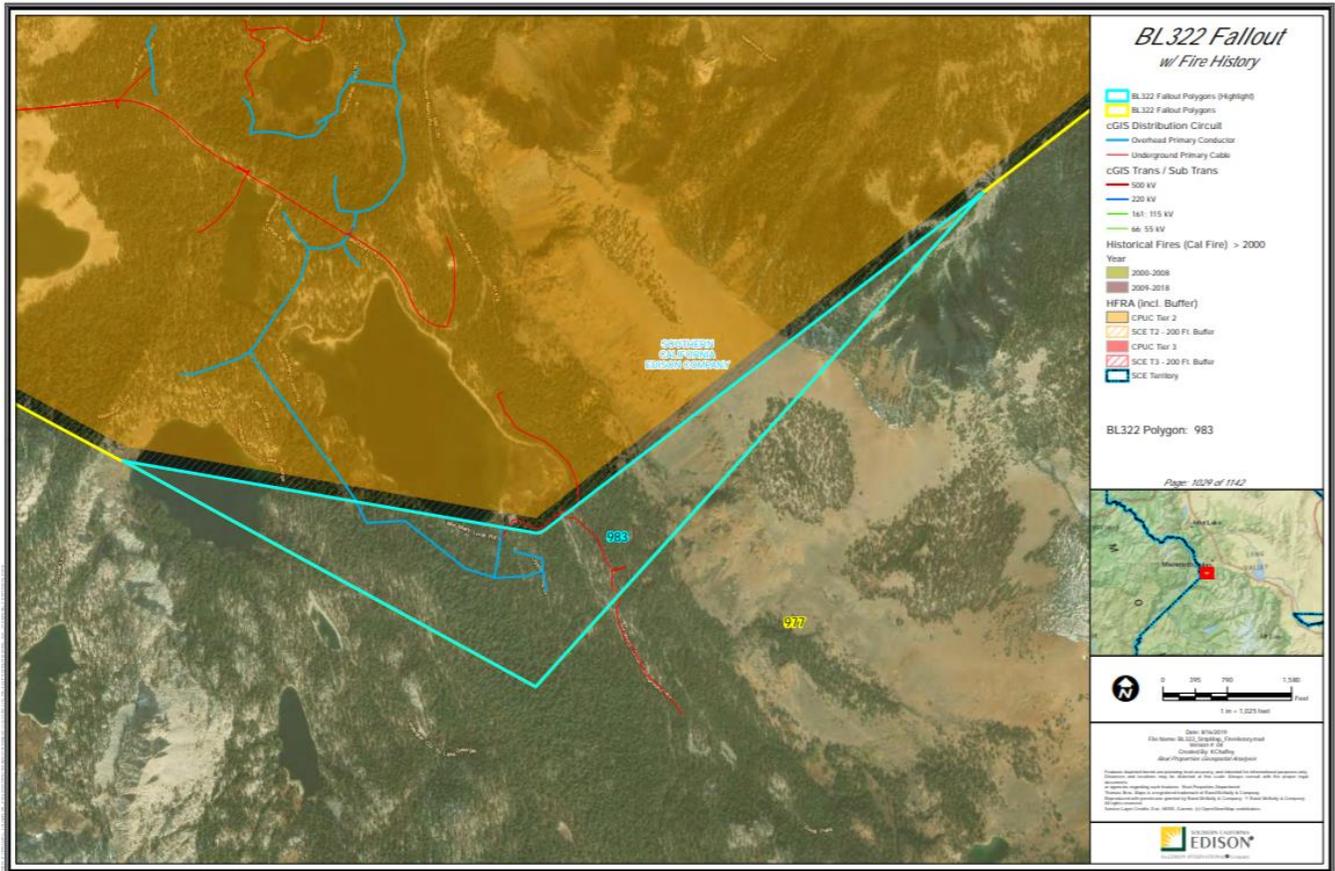| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.77	0.26	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
70	Yes	BARREN/OTHER,CONIFER,SHRUB,WATER

Mammoth Lakes - Polygon ID #983 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:
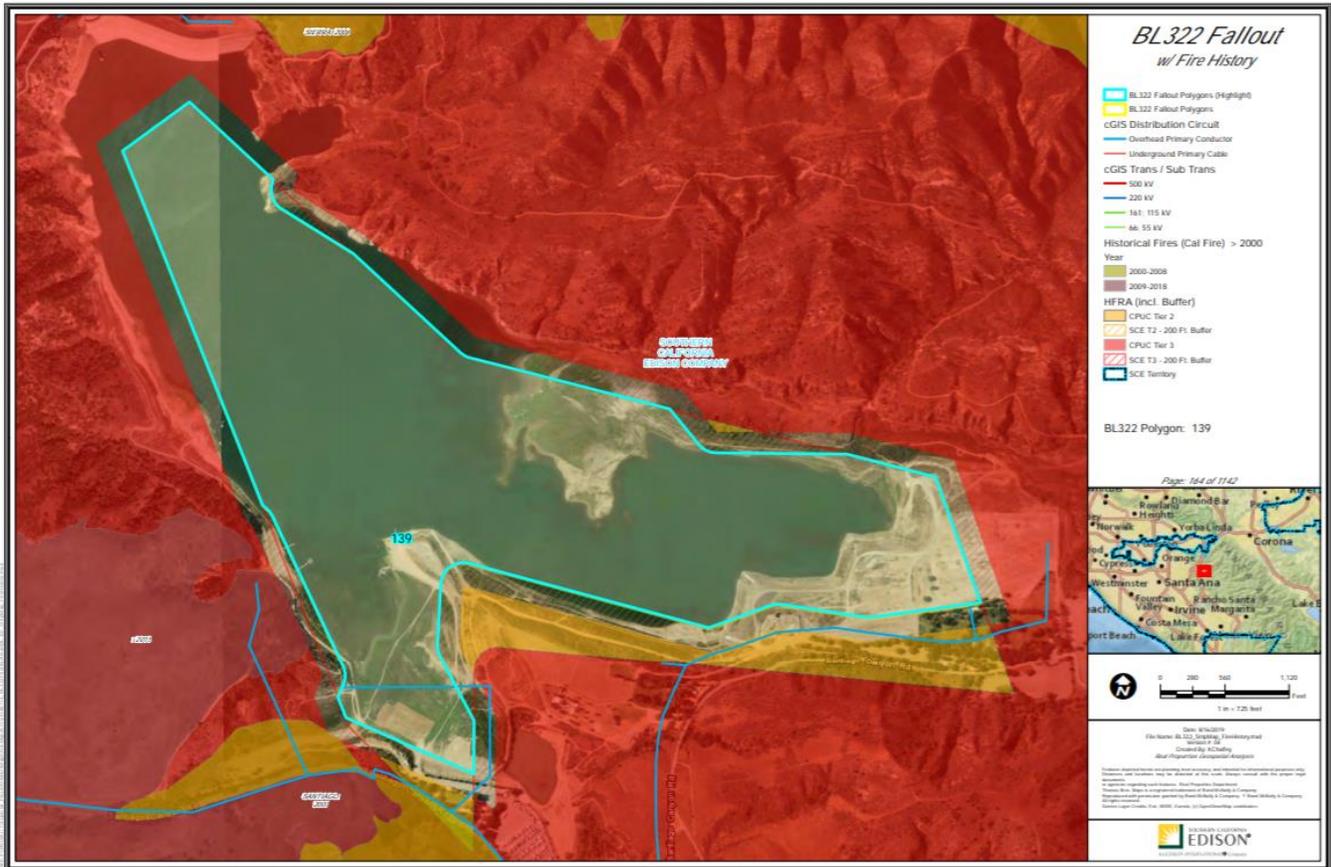
- Frequent wind events in the area
- High vegetation density
- Large areas of tree mortality identified near overhead
- Moderate fire history in the vicinity (2008 Sherwin)

Supporting Picture(s)

Silverado - Polygon ID #139

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
42	4,222	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.19	0.00	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
0	No	BARREN/OTHER,HERBACEOUS,SHRUB,URBAN,WATER

Silverado - Polygon ID #139 Tier 2 Inclusion Reasons

- High winds
- Moderate to dense vegetation under overhead lines in the southeast corner of the polygon
- Except during periods following heavy/frequent rains, this lake is prone to very low water levels and vegetation presents an ignition risk
- Adjacent to areas with significant fire history in the vicinity (2006 Sierra, 2007 Santiago, 2009 Racetrack, 2012 Santiago, 2015 Santiago, 2017 Canyon II)
- High wildfire consequence simulation risk scores

Supporting Picture(s)

Riverside County

Banning - Polygon ID #785

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
35	56,679	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

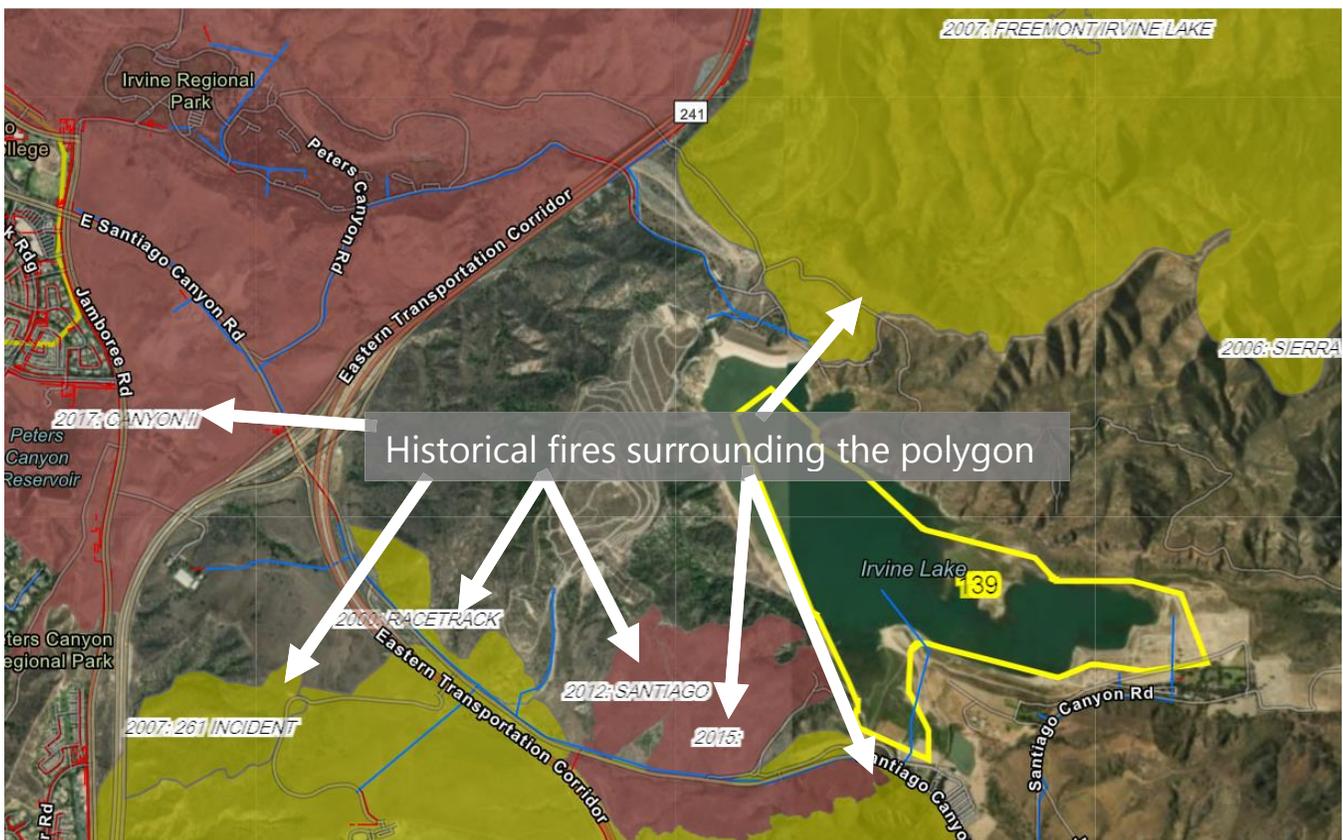| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.00	0.00	0.27	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
0	No	AGRICULTURE,SHRUB,URBAN

Banning - Polygon ID #785 Tier 2 Inclusion Reasons

- Significant fire history in the vicinity to the north (2005 Indian, 2013 Summit)
- High winds, potential for flying sparks or embers to blow into the communities
- High wildfire consequence simulation risk scores

Beaumont - Polygon ID #213

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
84	313,497	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

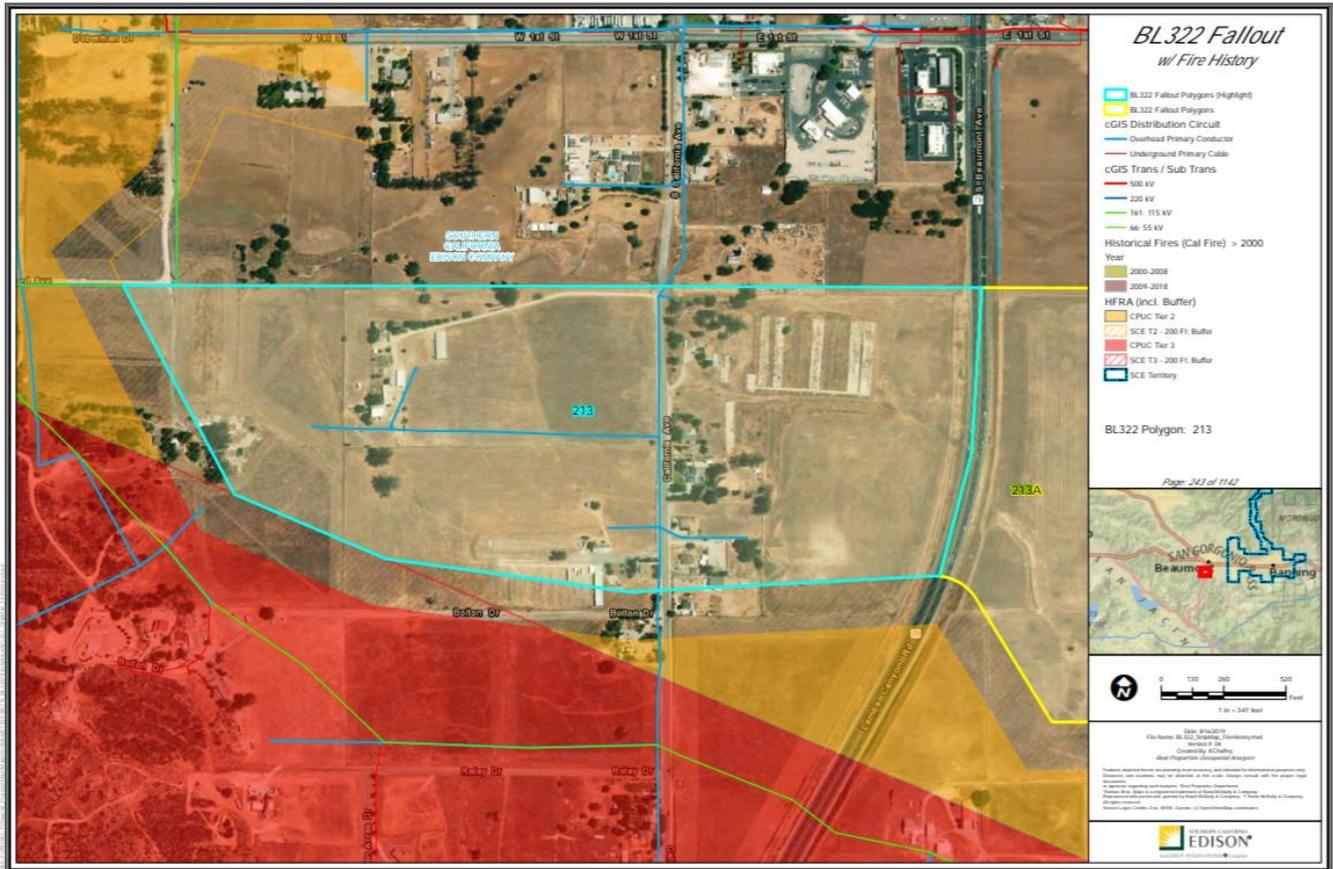| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.73	0.00	0.04	0.00

Polygon Attributes

| No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
9	No	AGRICULTURE,HARDWOOD,HERBACEOUS,SHRUB,URBAN

Beaumont - Polygon ID #213 Tier 2 Inclusion Reasons

- Potential for a wind-driven fire to carry into the neighboring Tier2 and Tier 3 areas
- Moderate vegetation directly under the overhead circuitry
- Moderate fire history in adjacent areas (2007 Esperanza, 2012 Lamb, 2013 Relay, 2017 Lamb 2)
- High wildfire consequence simulation risk scores

Supporting Picture(s)

Calimesa - Polygon ID #245
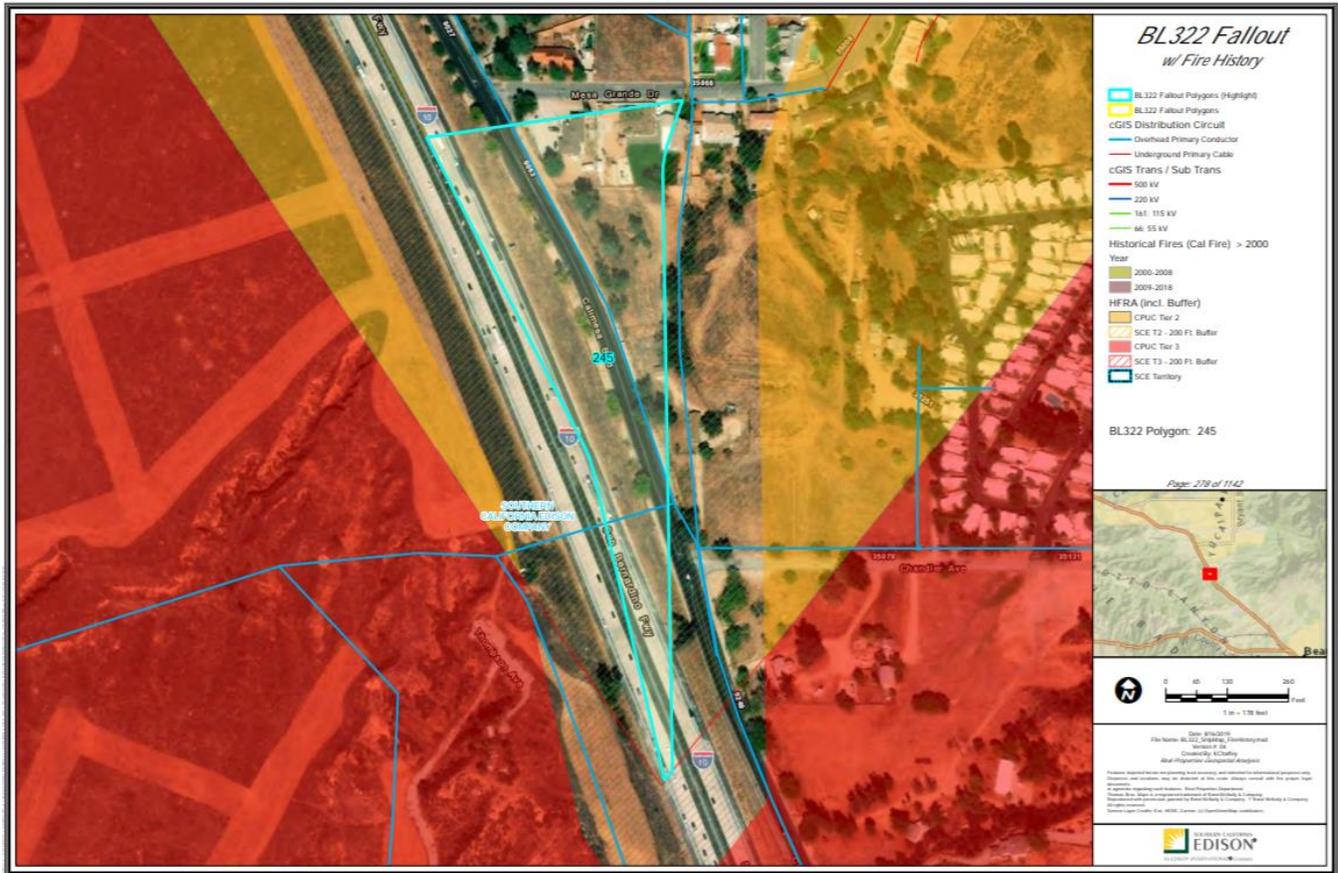
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
12	12,893	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.18	0.00	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
9	No	URBAN

Calimesa - Polygon ID #245 Tier 2 Inclusion Reasons

- High winds, potential for flying sparks or embers to blow into the adjacent Tier 2 and Tier 3 areas
- Moderate vegetation directly under overhead circuitry
- High wildfire consequence simulation risk scores

Supporting Picture(s)

Calimesa - Polygon ID #252

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
82	153,148	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.54	0.10	0.00	0.00

Polygon Attributes

| No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
15	No	AGRICULTURE,HARDWOOD,URBAN

Calimesa - Polygon ID #252 Tier 2 Inclusion Reasons

- High winds, potential for flying sparks or embers to blow into the adjacent Tier 2 and Tier 3 areasModerate vegetation directly under overhead circuitry
- Moderate fire history in adjacent areas (2015 Mustang, 2009 Palmer)
- High wildfire consequence simulation risk scores

Supporting Picture(s)

Cherry Valley - Polygon ID #233
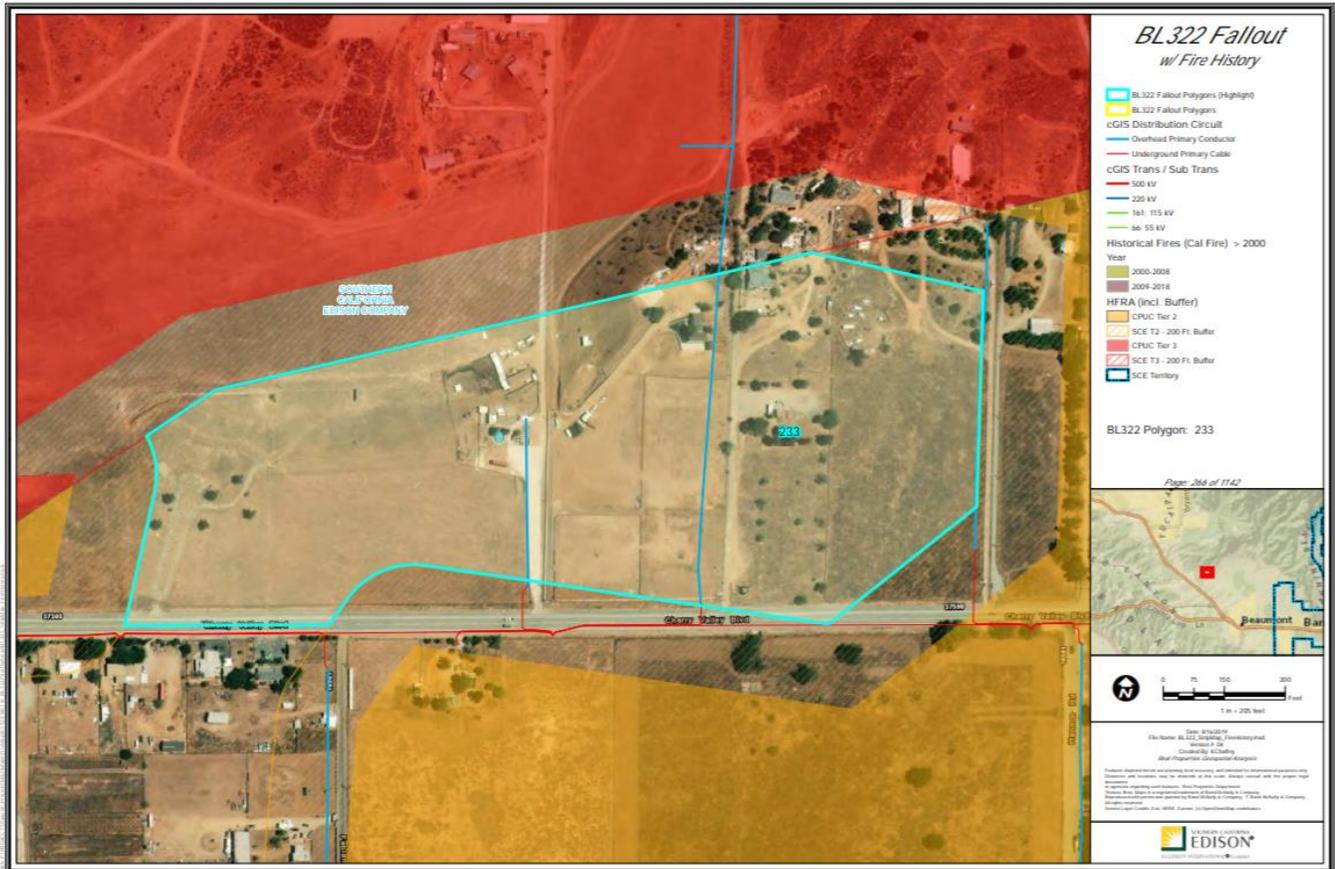
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
37	365,696	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.23	0.01	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
2	No	HERBACEOUS,SHRUB,URBAN

Cherry Valley - Polygon ID #233 Tier 2 Inclusion Reasons

- High winds, potential for flying sparks or embers to blow into the adjacent Tier 2 and Tier 3 areas
- Moderate vegetation directly under and near overhead power lines (see supporting picture below)
- High wildfire consequence simulation risk scores

Supporting Picture(s)

Cherry Valley - Polygon ID #243

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
280	204,527	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

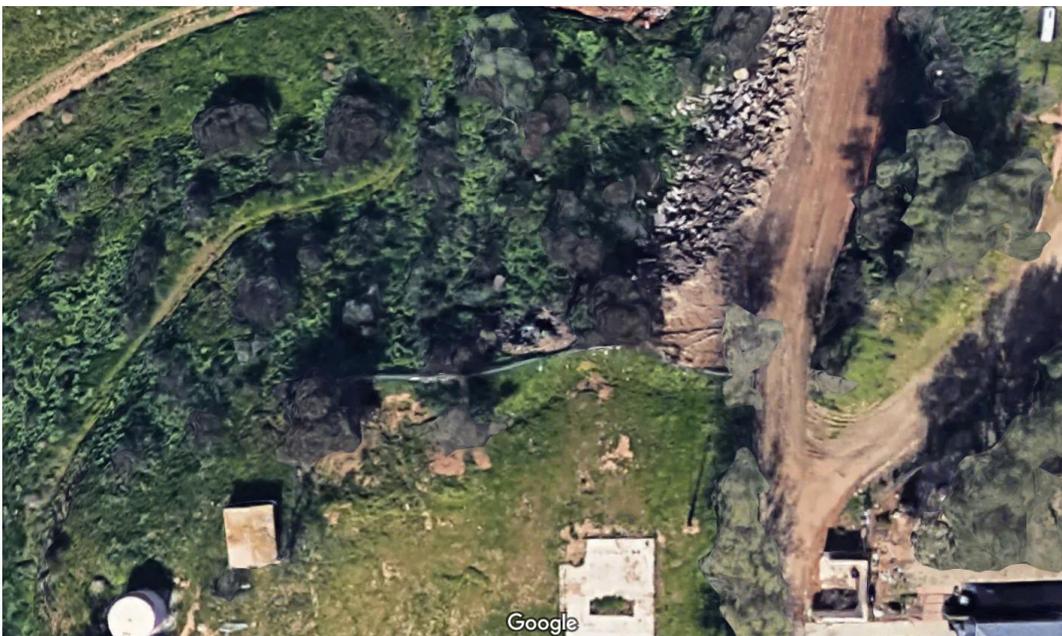| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
3.04	0.65	0.56	0.00

Polygon Attributes

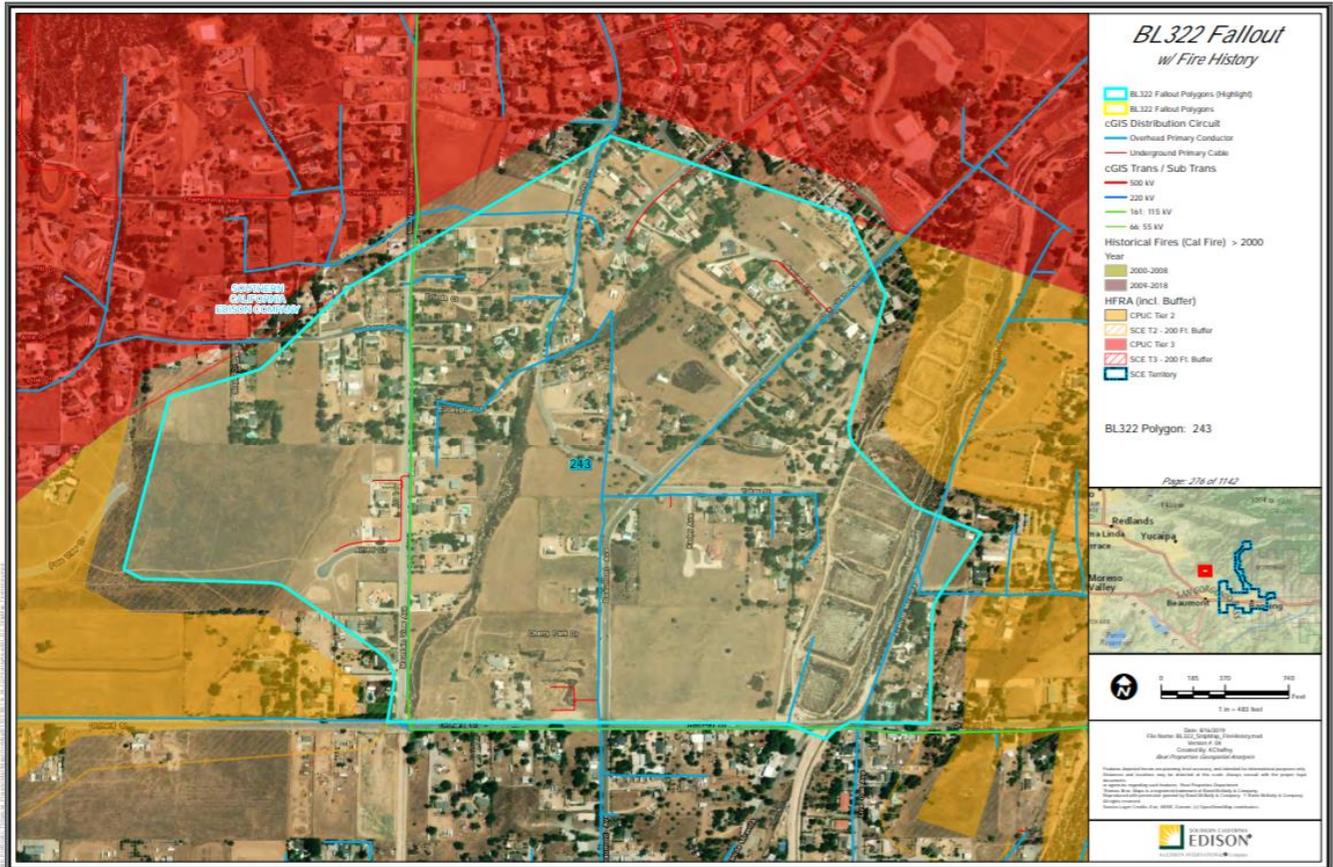| No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
131	No	SHRUB,URBAN

Cherry Valley - Polygon ID #243 Tier 2 Inclusion Reasons

- High winds, potential for flying sparks or embers to blow into the adjacent Tier 2 and Tier 3 areas
- Moderate vegetation directly under overhead circuitry
- Moderate fire history in adjacent areas (2014 Bogart, 2016 Bogart)
- High wildfire consequence simulation risk scores

Supporting Picture(s)

C-48

Cherry Valley - Polygon ID #1052
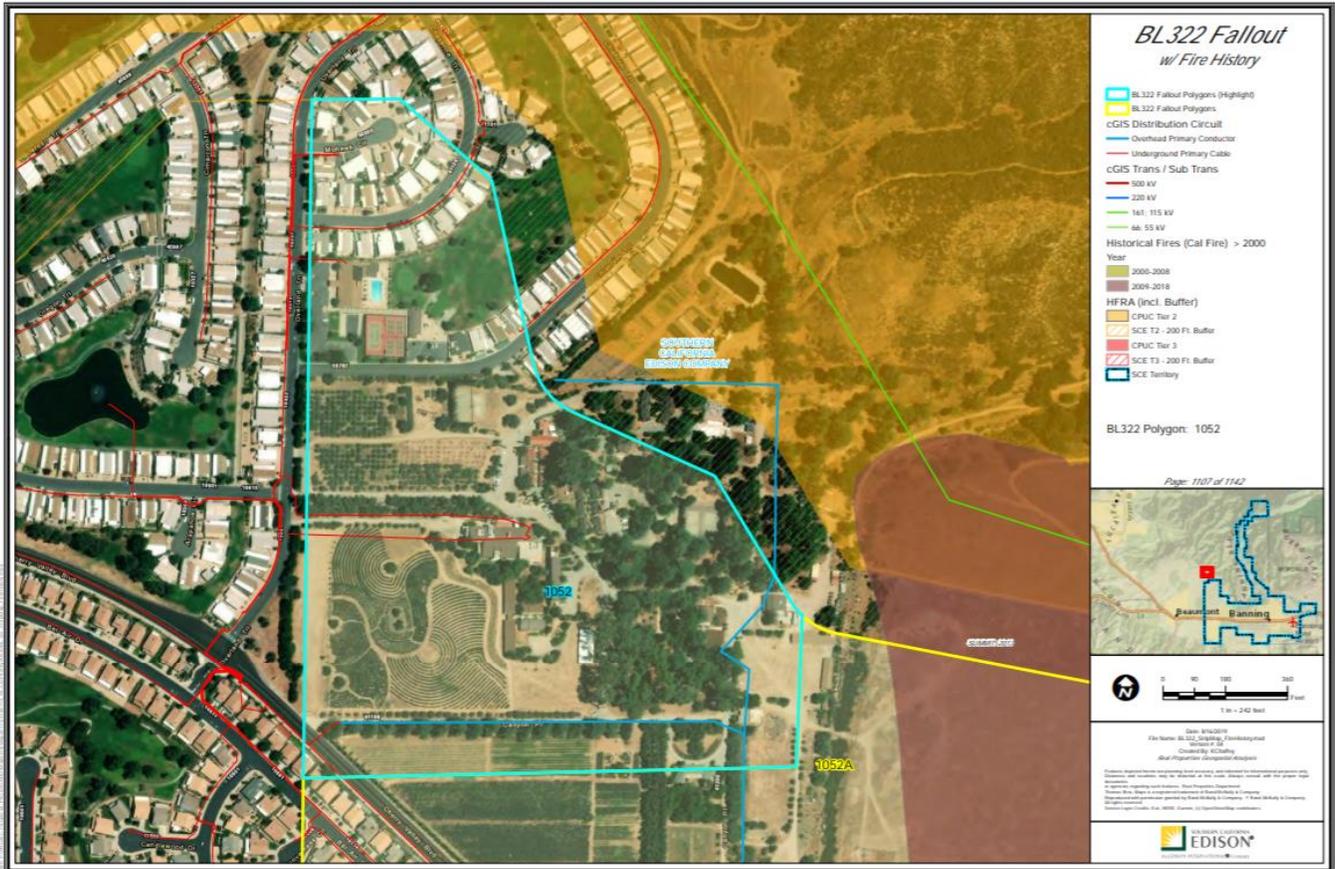
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
43	887	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.35	0.83	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
30	No	AGRICULTURE,HARDWOOD,HERBACEOUS,SHRUB,URBAN

Cherry Valley - Polygon ID #1052 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:

- High winds, potential for fire spread into Tier 2
- Moderate to heavy vegetation directly under overhead circuitry
- Fire history in adjacent area (2013 Summit fire)

Corona - Polygon ID #116

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
28	1,917	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.48	0.36	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
4	No	URBAN

Corona - Polygon ID #116 Tier 2 Inclusion Reasons

- Moderate fuel growth potential
- Presents burn-in risk
- Moderate fire history in adjacent areas (2002 Indian, 2004 Cerrito, 2008 Lake)
- Wildfire consequence simulation results indicate high risk potential

Corona - Polygon ID #149

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$ 1225?
1,274	22,591	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

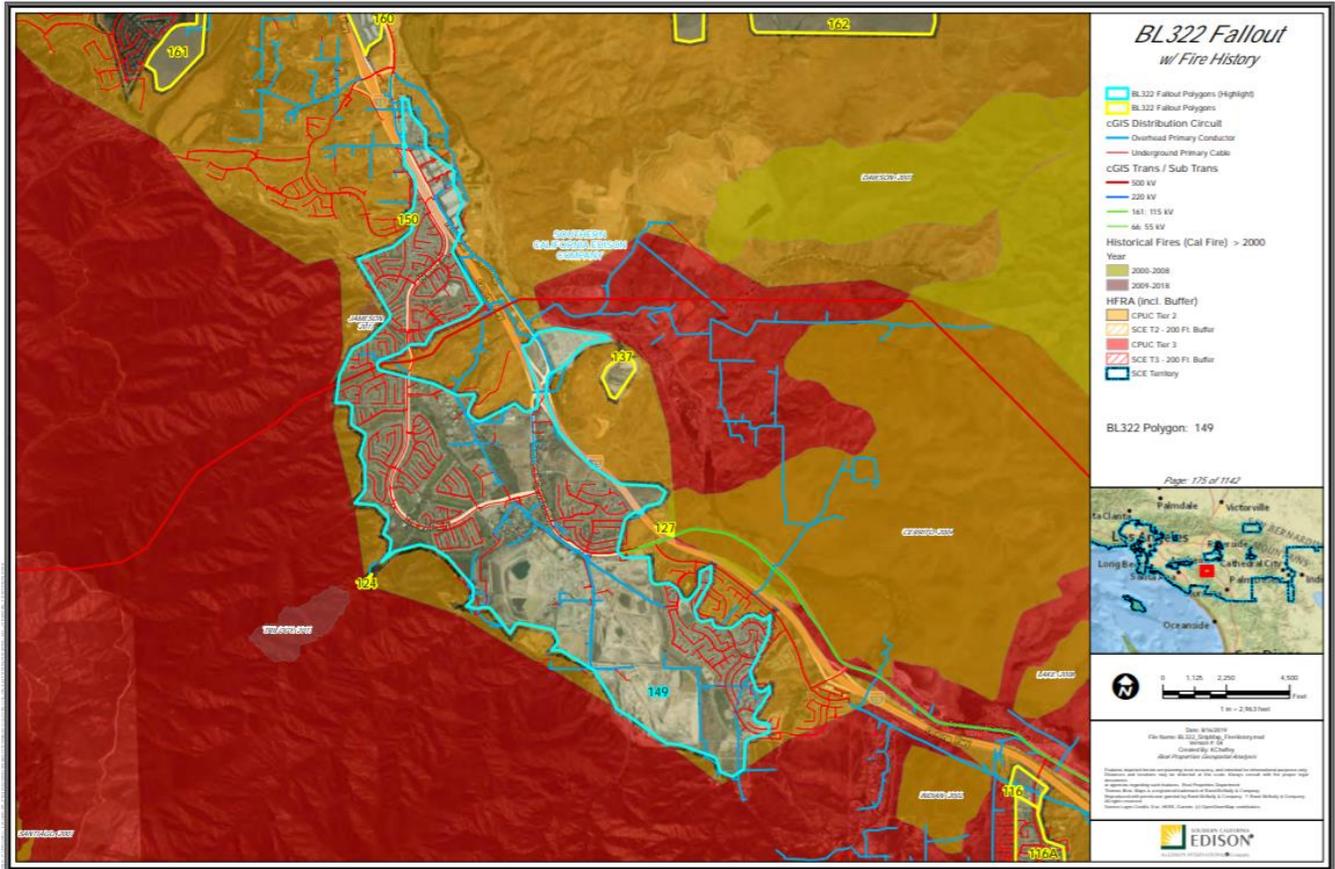| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
13.97	50.37	0.00	0.29

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
513	No	AGRICULTURE,HARDWOOD,SHRUB,URBAN

Corona - Polygon ID #149 Tier 2 Inclusion Reasons

- High potential for fire propagation with windy conditions.
- Significant fire history in adjacent areas (2002 Indian, 2007 Dawson, 2007 Sierra, 2008 Lake, 2011 Trilogy, 2012 Range)
- Wildfire consequence simulation results indicate high risk potential

Corona - Polygon ID #161

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
135	45,730	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

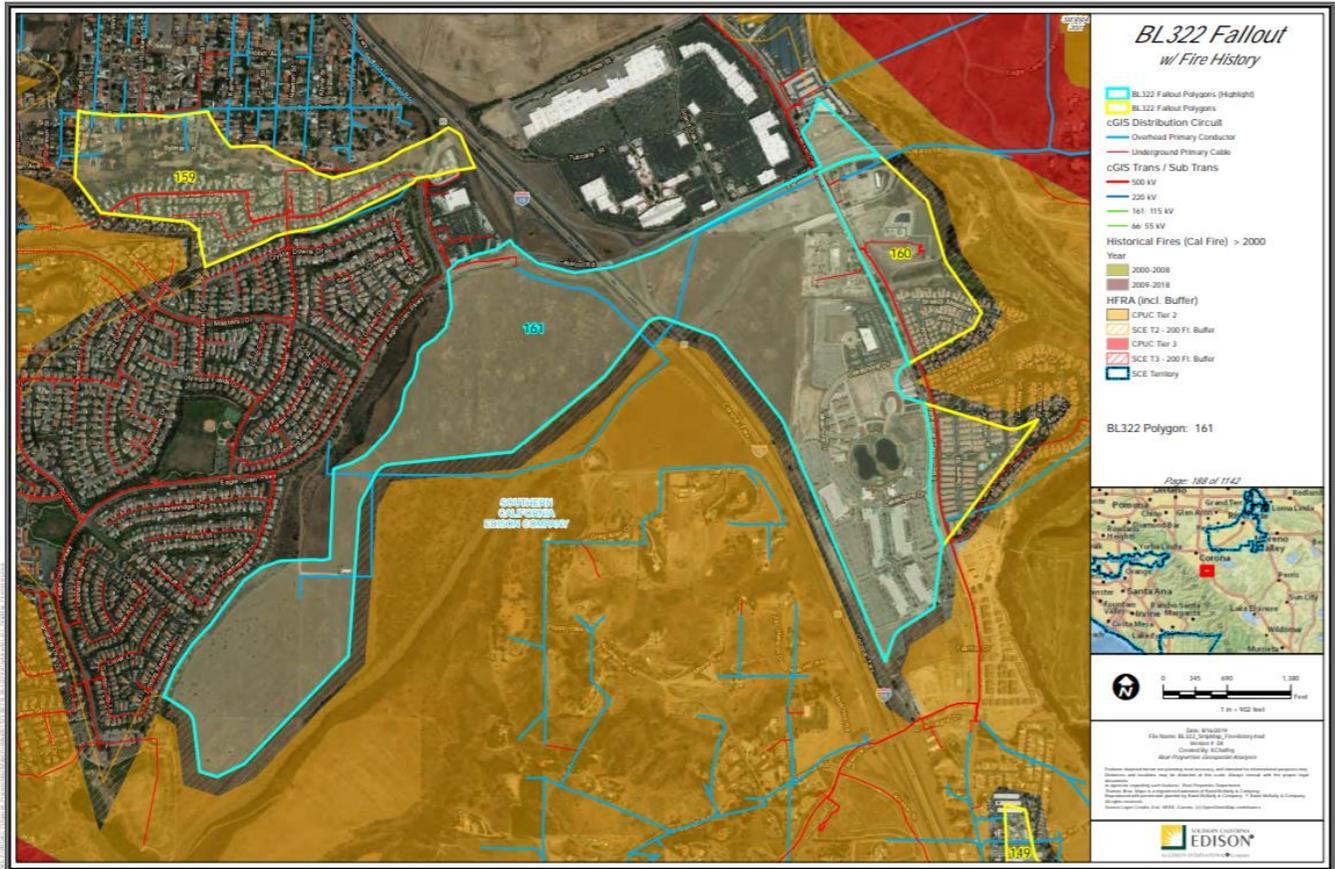| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
1.76	4.04	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires		
0	N/A		
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)	
0	No	AGRICULTURE,HERBACEOUS,SHRUB,URBAN,WATER	

Corona - Polygon ID #161 Tier 2 Inclusion Reasons

- There is potential for a wind-driven fire to carry into the neighboring Tier 2 and Tier 3 areas.
- Fire history in adjacent areas (2007 Sierra)
- Wildfire consequence simulation results indicate high risk potential

Hemet - Polygon ID #110

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
No Results	No Results	No Results

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.01	0.00	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
0	No	URBAN

Hemet - Polygon ID #110 Tier 2 Inclusion Reasons

There were no Reax wildfire consequence results for this polygon. This is due to the method of the simulation. Reax methodology utilized a Monte-Carlo simulation which uses computational algorithms that rely on repeated random sampling that may not have generated a simulated ignition in this small area due to the limited amount of overhead circuitry within the polygon. However, we continue to recommend this polygon for inclusion for the following reasons:

- Overhead traverses over moderate to dense vegetation
- Presents burn-in risk into adjacent Tier 2 and nearby Tier 3 areas
- Fire history in the vicinity (2004 Citrus)

Supporting Picture(s)

Home Gardens - Polygon ID #183

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
13	7	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.08	0.00	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
0	No	URBAN

Home Gardens - Polygon ID #183 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:

- High wind area
- There is potential for a wind-driven fire to carry into Tier 2
- Overhead traverses over moderate to dense vegetation areas

Supporting Picture(s)

Palm Springs - Polygon ID #221
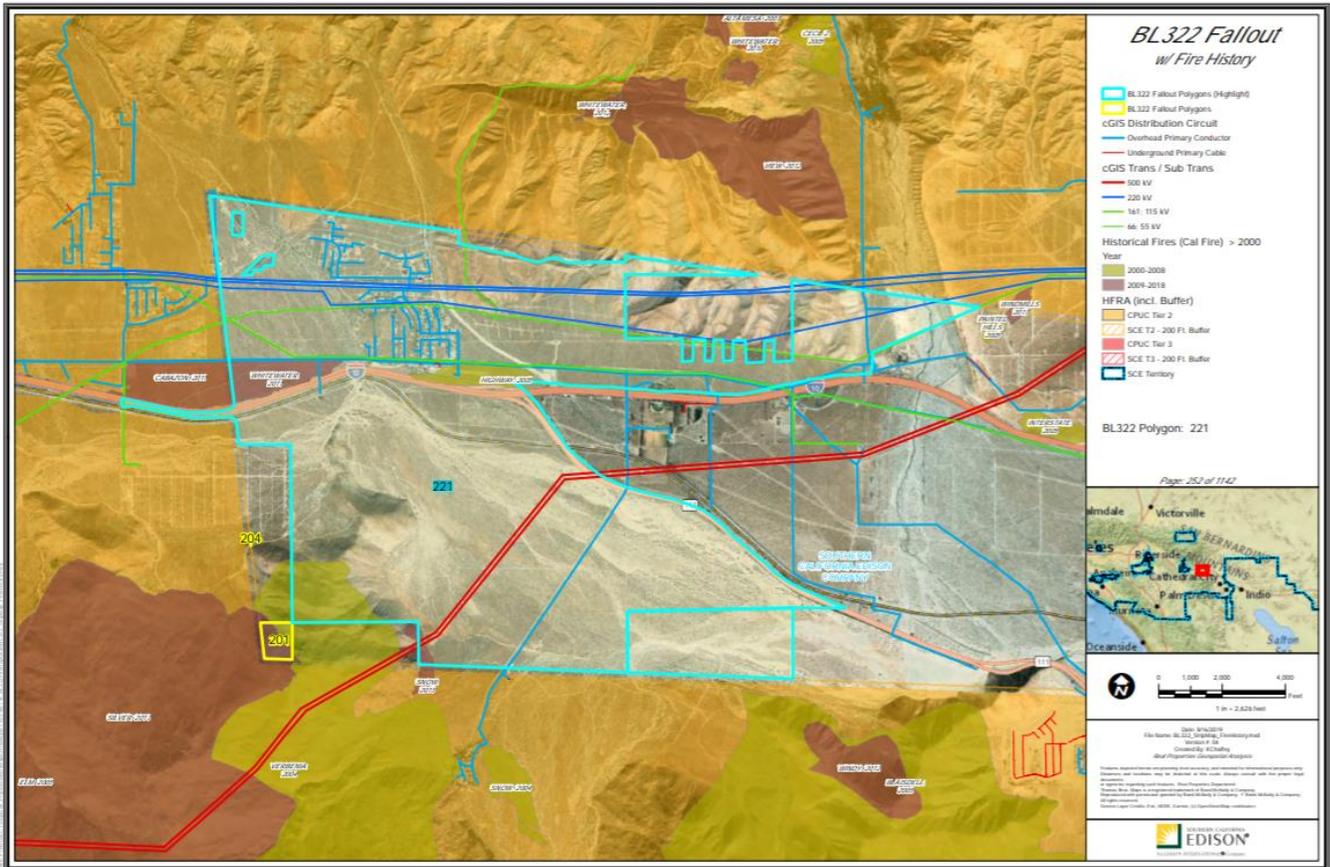
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
2,274	143,571	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

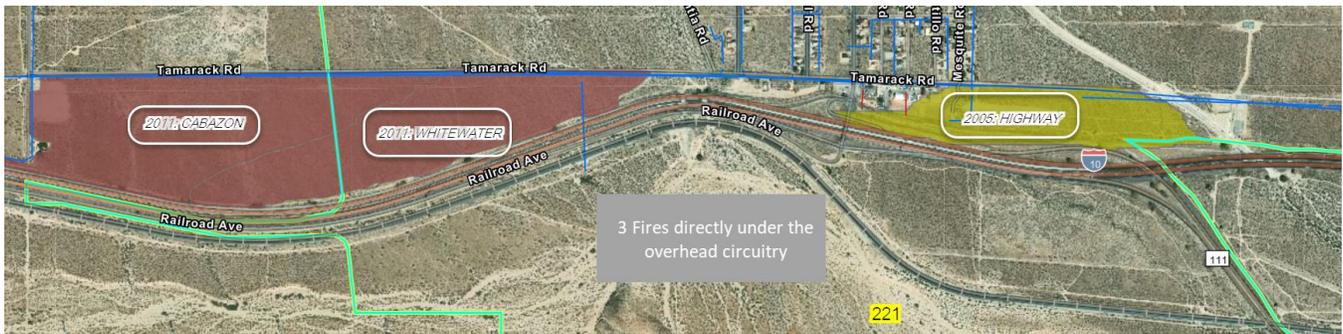| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
19.78	0.50	7.24	14.54

Polygon Attributes

| No. of Previous Fires	List of Previous Fires	
5	2004 Verbenia, 2005 Highway, 2011 Cabazon, 2011 Whitewater, 2015 Snow	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
126	No	BARREN/OTHER,HERBACEOUS,SHRUB,URBAN

Palm Springs - Polygon ID #221 Tier 2 Inclusion Reasons

- Moderate fire history within polygon and significant history in adjacent areas; three fires occurred directly under the overhead circuitry (2004 Verbenia, 2004 Snow, 2004 Verbenia, 2005 Highway, 2005 Painted Hills, 2005 Interstate, 2005 Elm, 2011 Cabazon, 2011 Whitewater, 2012 View, 2012 Whitewater, 2012 Windy, 2013 Silver, 2015 Snow, 2017 Windmills)
- Mountains on both sides create a high wind corridor
- Wildfire consequence simulation results indicate a very high risk potential
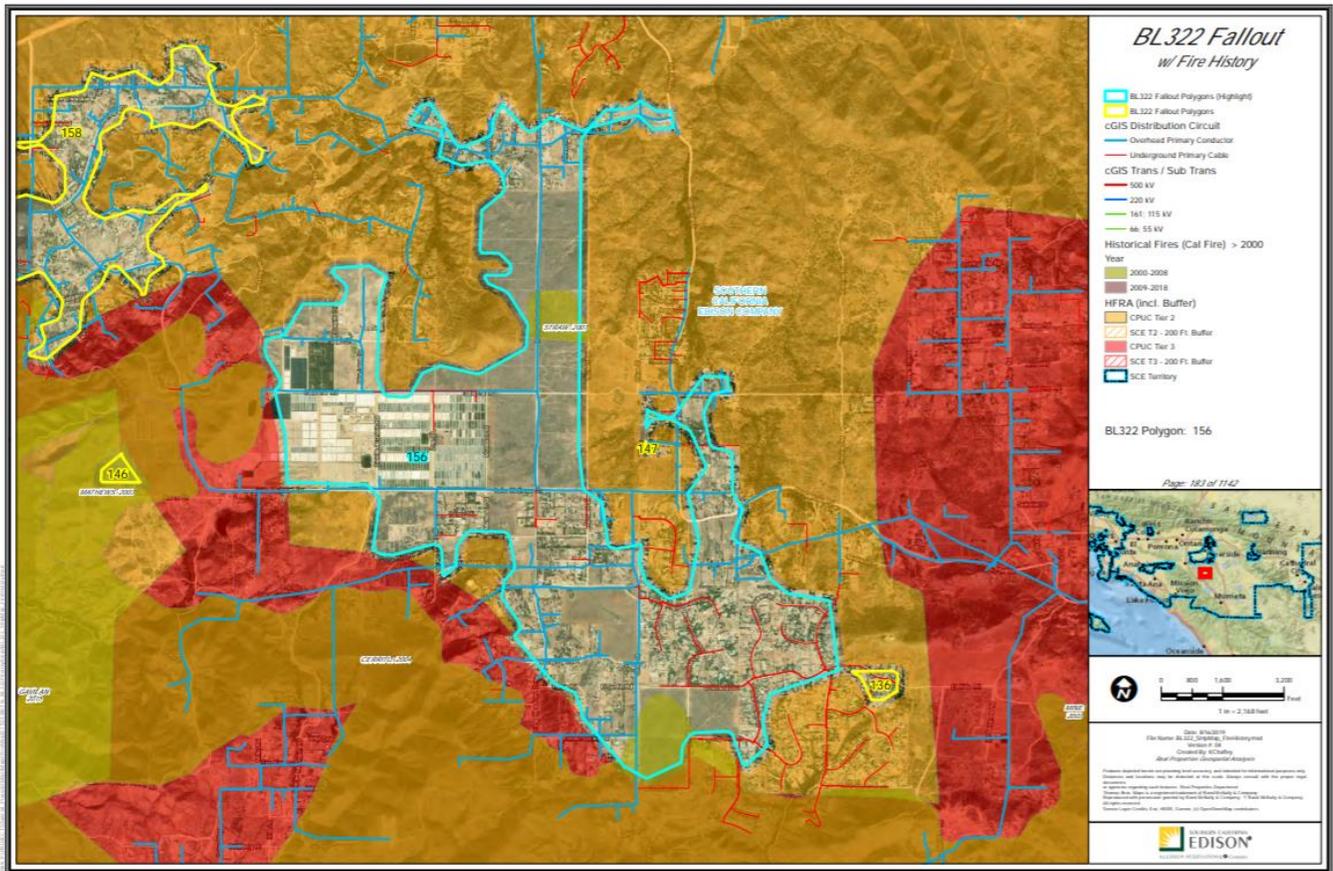
Supporting Picture(s)

Perris - Polygon ID #156

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
1,363	54,238	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

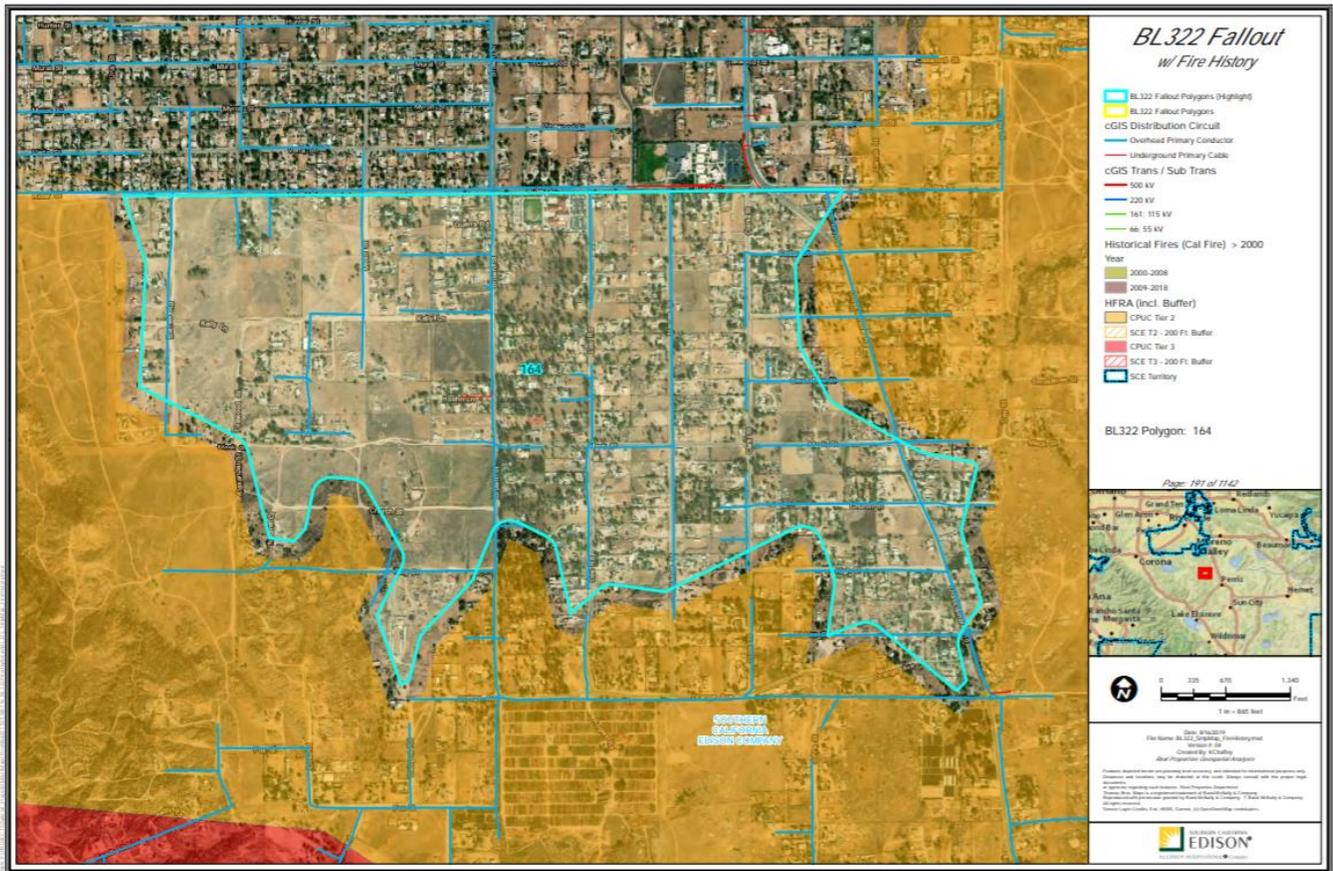| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
13.93	7.31	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
2	2004 Cerrito, 2007 Straw	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
263	No	AGRICULTURE,CONIFER,HARDWOOD,HERBACEOUS,SHRUB,URBAN

Perris - Polygon ID #156 Tier 2 Inclusion Reasons

- There is potential for a wind-driven fire to carry into the neighboring Tier 2 and Tier 3 areas
- Moderate fire history within the polygon and significant fire history in adjacent areas; three fires occurred directly under the overhead circuitry (2003 Mathews, 2003 Mine, 2003 Maywood, 2004 Cerrito, 2007 Straw)
- Wildfire consequence simulation results indicate high risk potential

Perris - Polygon ID #164

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
772	200,176	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
7.20	0.21	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
176	No	AGRICULTURE,CONIFER,HARDWOOD,HERBACEOUS,SHRUB,URBAN

Perris - Polygon ID #164 Tier 2 Inclusion Reasons

- High wind area
- There is potential for a wind-driven fire to carry into the adjacent Tier 2 area
- Moderate, continuous fuels under some overhead lines
- Wildfire consequence simulation results indicate significant high risk potential

Perris - Polygon ID #1045

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
91	64,629	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

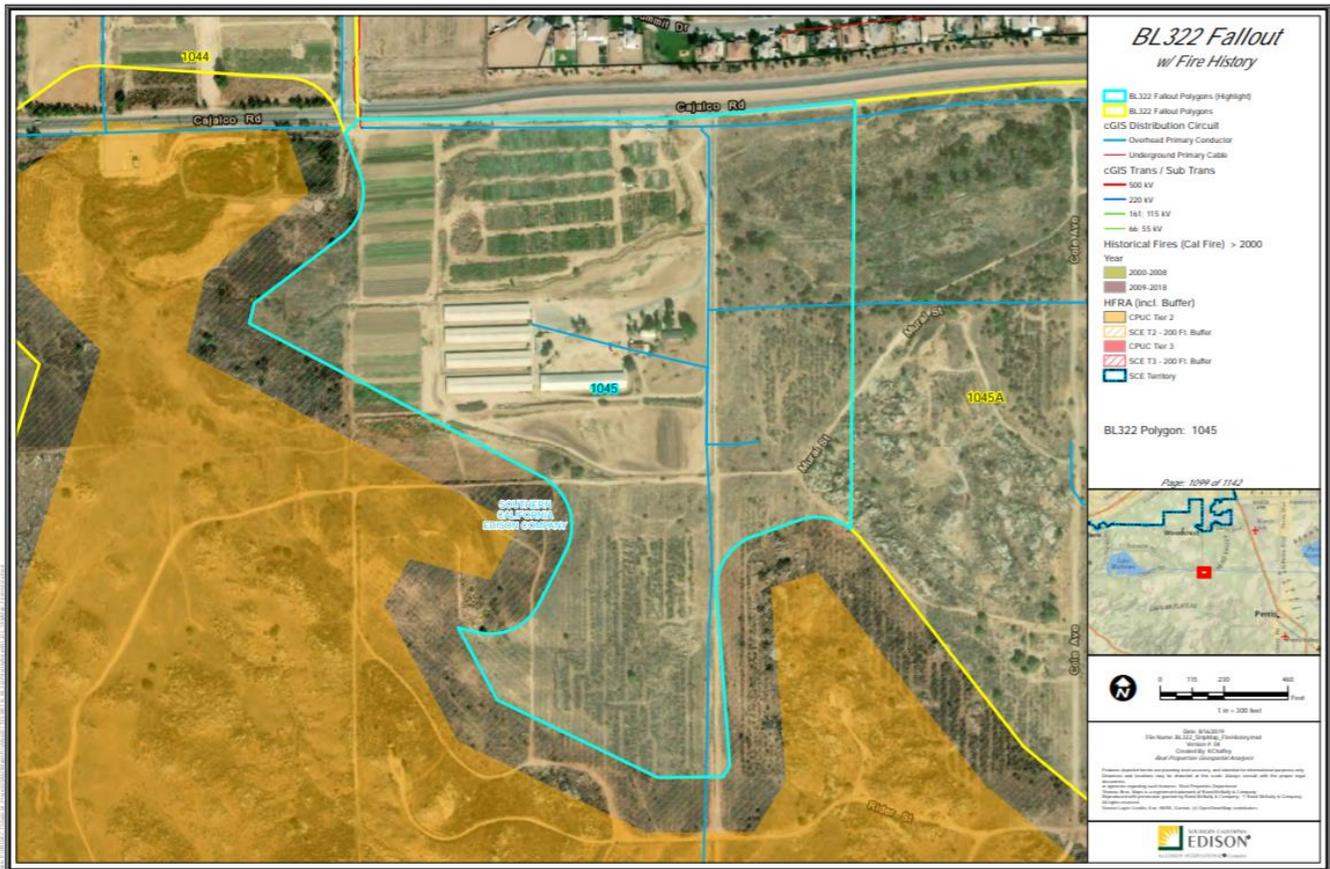| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
1.10	0.04	0.00	0.00

Polygon Attributes

| No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
0	No	AGRICULTURE,HARDWOOD,HERBACEOUS,SHRUB,URBAN

Perris - Polygon ID #1045 Tier 2 Inclusion Reasons

- High wind area
- There is potential for a wind-driven fire to carry into the adjacent Tier 2 area
- Moderate, continuous fuels under some overhead lines
- Wildfire consequence simulation results indicate high risk potential

Supporting Picture(s)

Perris - Polygon ID #1045A
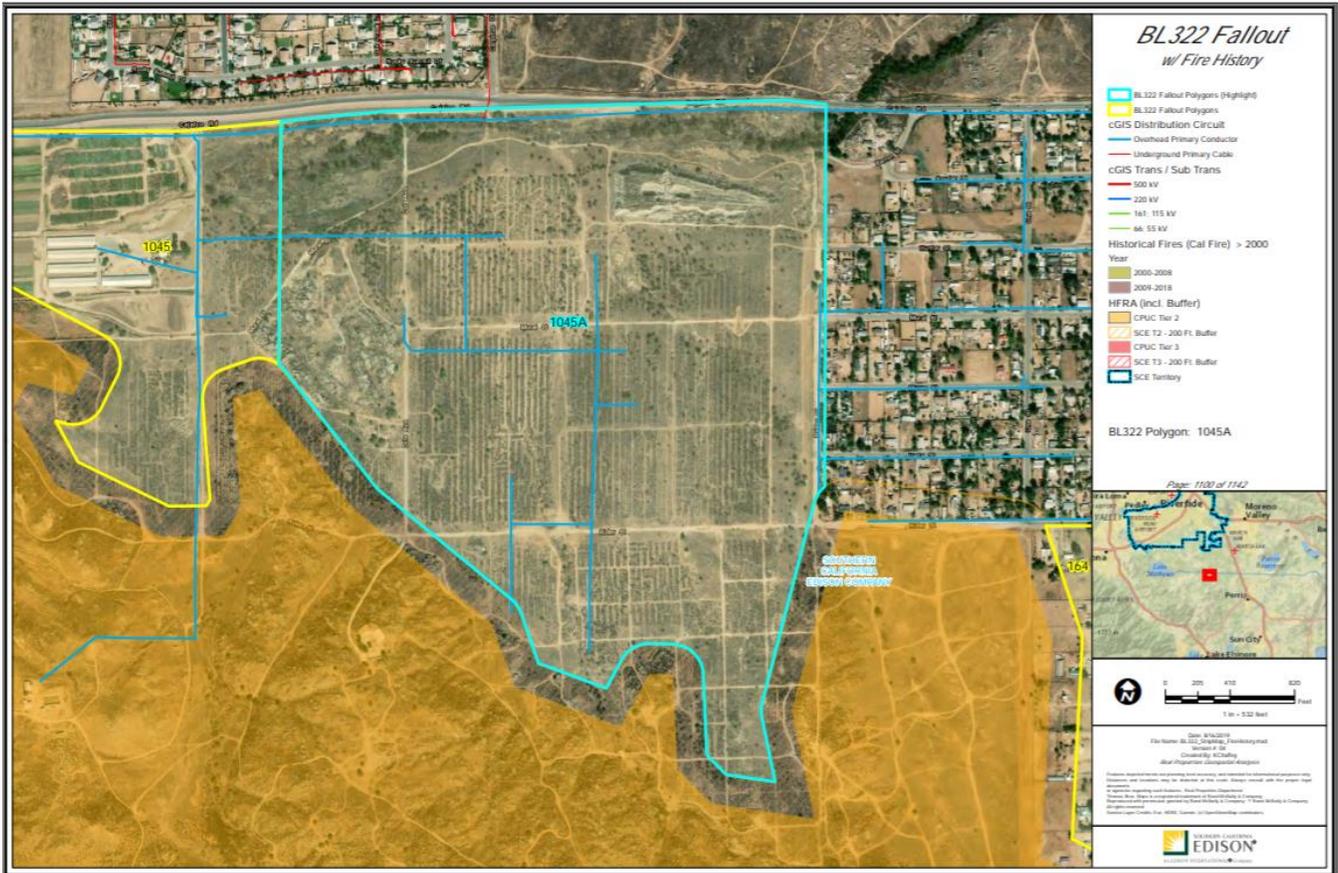
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
234	96,998	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
2.41	0.00	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
34	No	AGRICULTURE,HARDWOOD,HERBACEOUS,SHRUB,URBAN

Perris - Polygon ID #1045A Tier 2 Inclusion Reasons

- High wind area
- There is potential for a wind-driven fire to carry into the adjacent Tier 2 area
- Moderate, continuous fuels under some overhead lines
- Wildfire consequence simulation results indicate high risk potential

Supporting Picture(s)

Riverside – Polygon ID #187

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
1,342	17,054	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

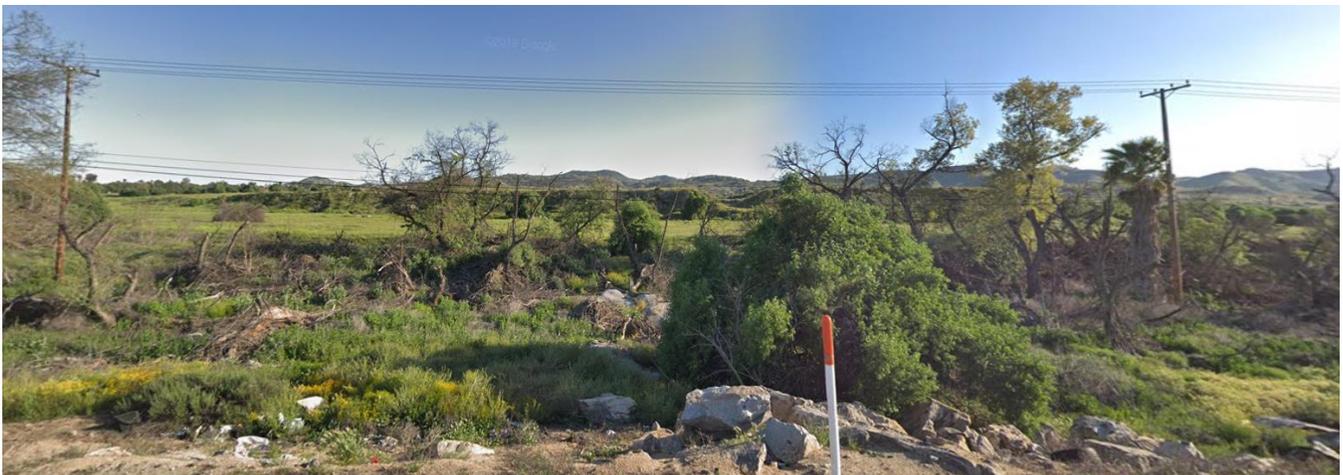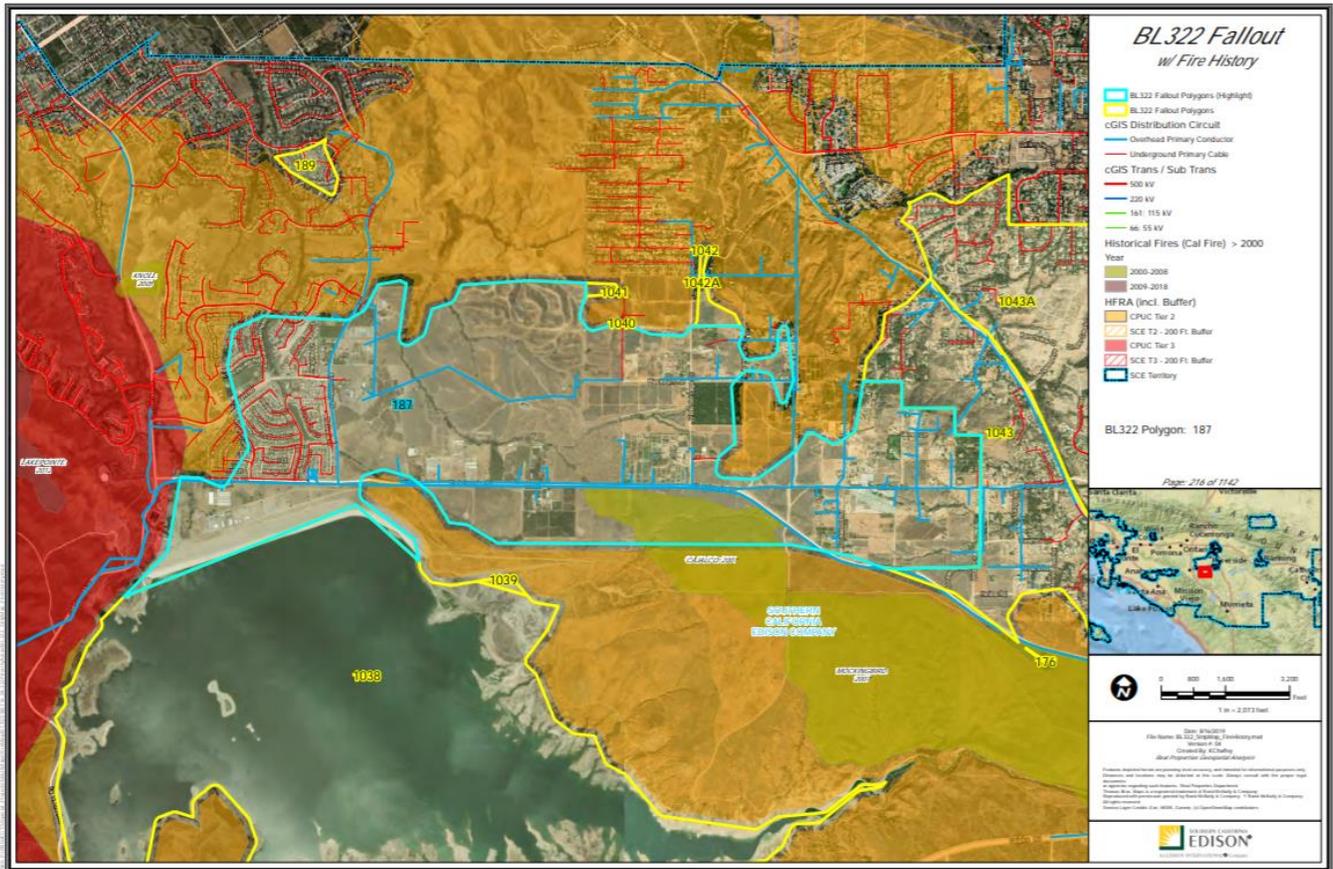| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
15.95	8.59	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
1	2001 Cajalco	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
112	No	AGRICULTURE,CONIFER,HARDWOOD,HERBACEOUS,SHRUB,URBAN,WATER

Riverside – Polygon ID #187 Tier 2 Inclusion Reasons

- High fuel potential
- High wind area, potential for a wind-driven fire to carry into the adjacent Tier 2 and Tier 3 areas
- Fire history within polygon and significant fire history in areas adjacent to this polygon (2001 Cajalco, 2005 Knoll, 2007 Sierra, 2007 Mockingbird, 2012 Lakepointe)
- Overhead circuitry traverses through the 2001 Cajalco areas
- High wildfire consequence simulation risk scores
- Previously submitted to the CPUC for Tier 2 inclusion

Riverside - Polygon ID #281

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$ 1225?
10	56	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.31	0.00	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
4	No	SHRUB,URBAN,WATER

Riverside - Polygon ID #281 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:

- High wind area; there is a wind funnel here created by the Santa Anas coming from the northeast
- The topography in the area, combined with fuels and winds, creates an increased likelihood of rapid fire spread
- Potential for flying sparks or embers to blow into community

Riverside - Polygon ID #1042

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
2	856	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.02	0.00	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
0	No	AGRICULTURE,HARDWOOD

Riverside - Polygon ID #1042 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:

- Surrounded by Tier 2 with moderate fuel growth potential
- Burnable fuels between the existing Tier 2 boundaries
- Previously submitted to the CPUC for Tier 2 inclusion

Woodcrest - Polygon ID #1043
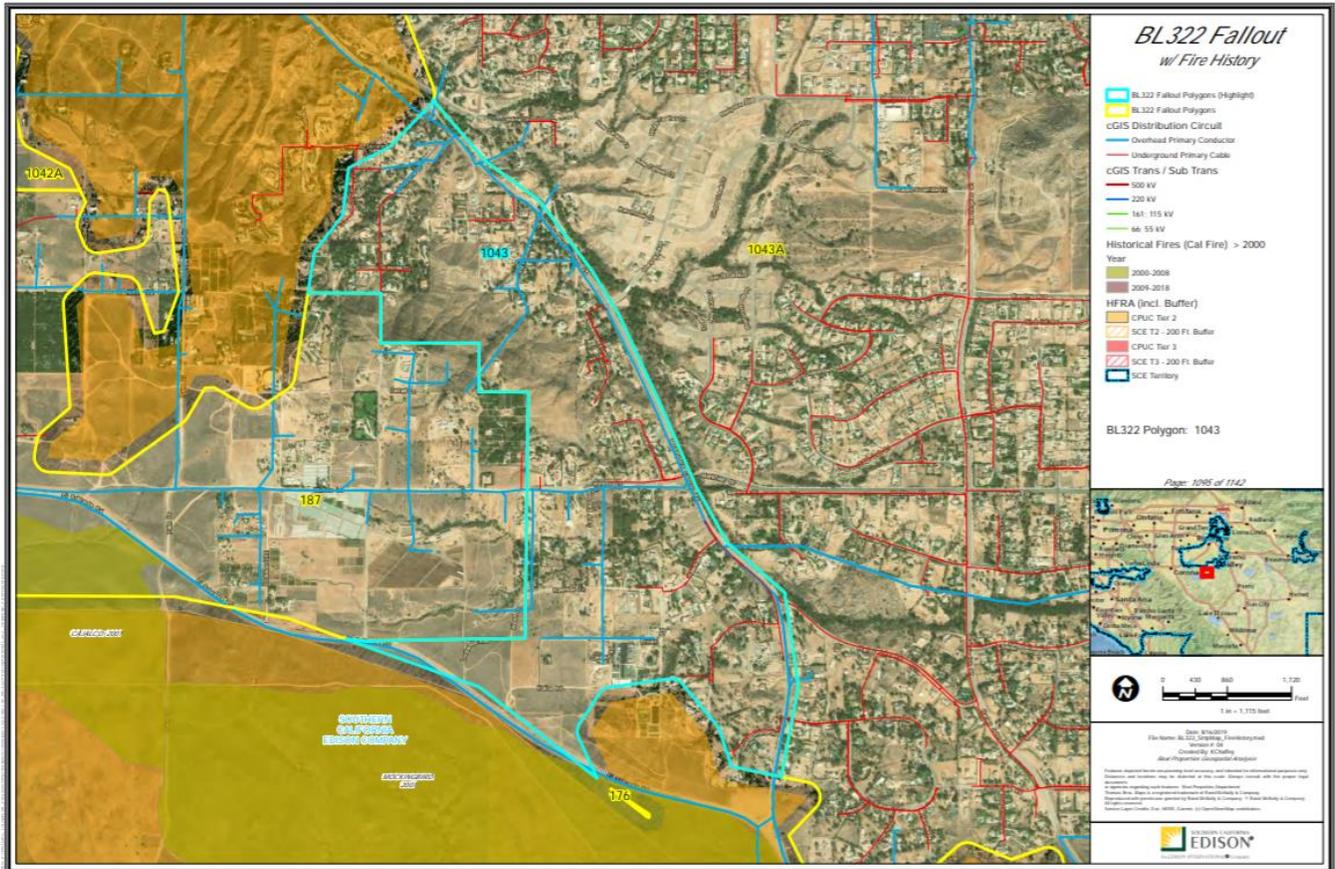
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk >1225?
454	12,868	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
6.15	3.11	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
1	2007 Mockingbird	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
127	No	AGRICULTURE,CONIFER,HARDWOOD,HERBACEOUS,SHRUB,URBAN

Woodcrest - Polygon ID #1043 Tier 2 Inclusion Reasons

- Moderate to dense vegetation directly under some overhead lines
- Fire history within the polygon and adjacent areas (2001 Cajalco, 2007 Mockingbird)
- Previously submitted to the CPUC for Tier 2 inclusion
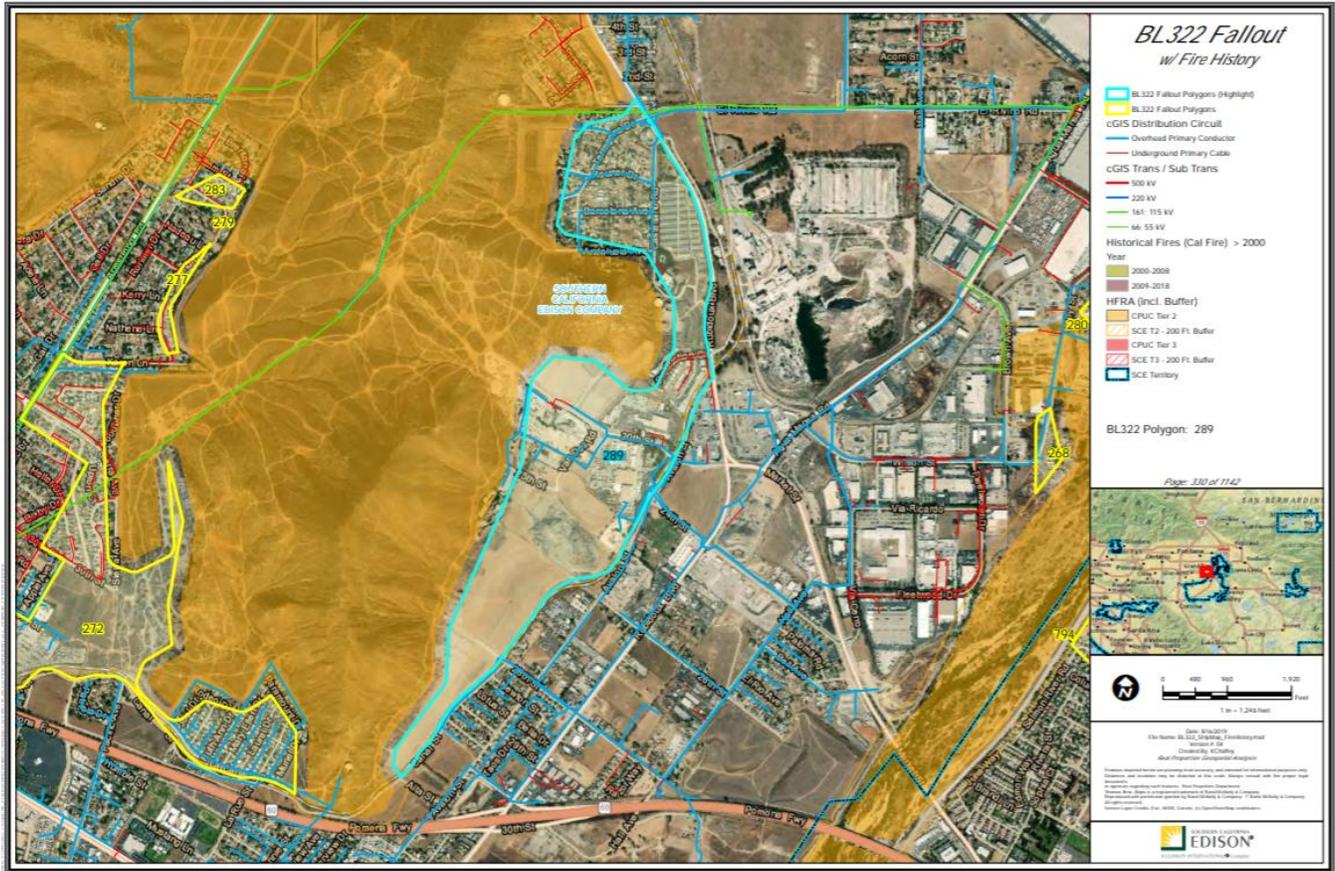- Wildfire consequence simulation results indicate high risk potential

Supporting Picture(s)

San Bernardino County

Bloomington – Polygon ID #289

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
277	173	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
2.94	0.61	0.10	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
126	No	AGRICULTURE,HERBACEOUS,SHRUB,URBAN

Bloomington – Polygon ID #289 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:

- High wind area, potential for a wind-driven fire to carry into the adjacent Tier 2 area
- Moderate, continuous fuel under some overhead lines

Chino Hills - Polygon ID #314
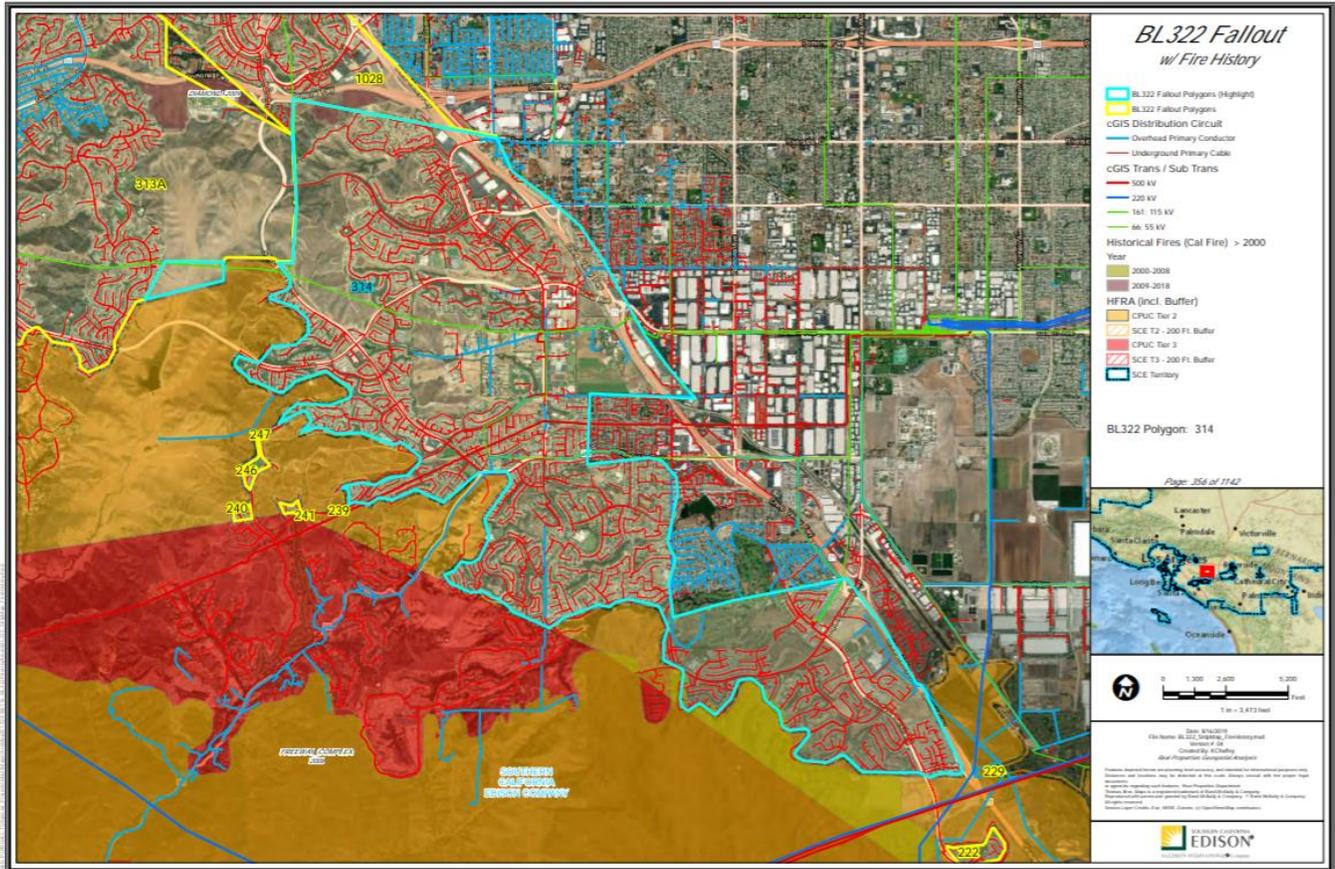
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
1,827	6,245	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

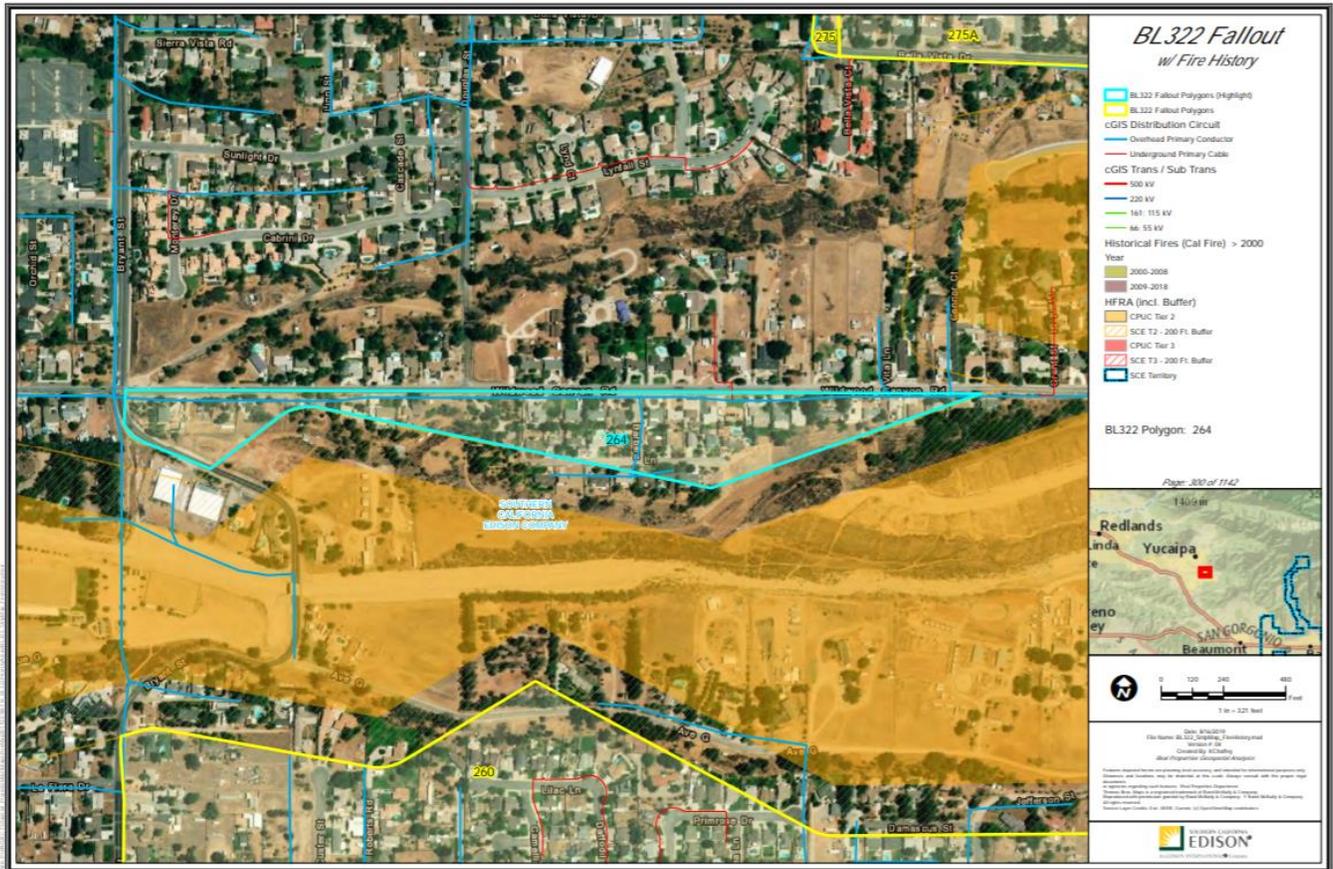| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
11.75	178.37	11.58	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
2	2008 Freeway Complex, 2009 Diamond	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
677	No	BARREN/OTHER,HARDWOOD,HERBACEOUS,SHRUB,URBAN

Chino Hills - Polygon ID #314 Tier 2 Inclusion Reasons

- High wind area, moderate probability to propagate into adjacent Tier 2/3 areas with the right wind conditions
- Fire history within the polygon and adjacent areas (2008 Freeway Complex, 2009 Diamond)
- Wildfire consequence simulation results indicate high risk potential
- Previously submitted to the CPUC for Tier 2 inclusion

Yucaipa - Polygon ID #264

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
17	565	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.70	0.00	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
18	No	HERBACEOUS,URBAN

Yucaipa - Polygon ID #264 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:

- This circuit is known to have an increased frequency of outages during windy conditions due to flying debris
- Not a typical high wind area; however, when there are wind events, moderate to significant unmaintained vegetation cause blow-in faults

Yucaipa - Polygon ID #287
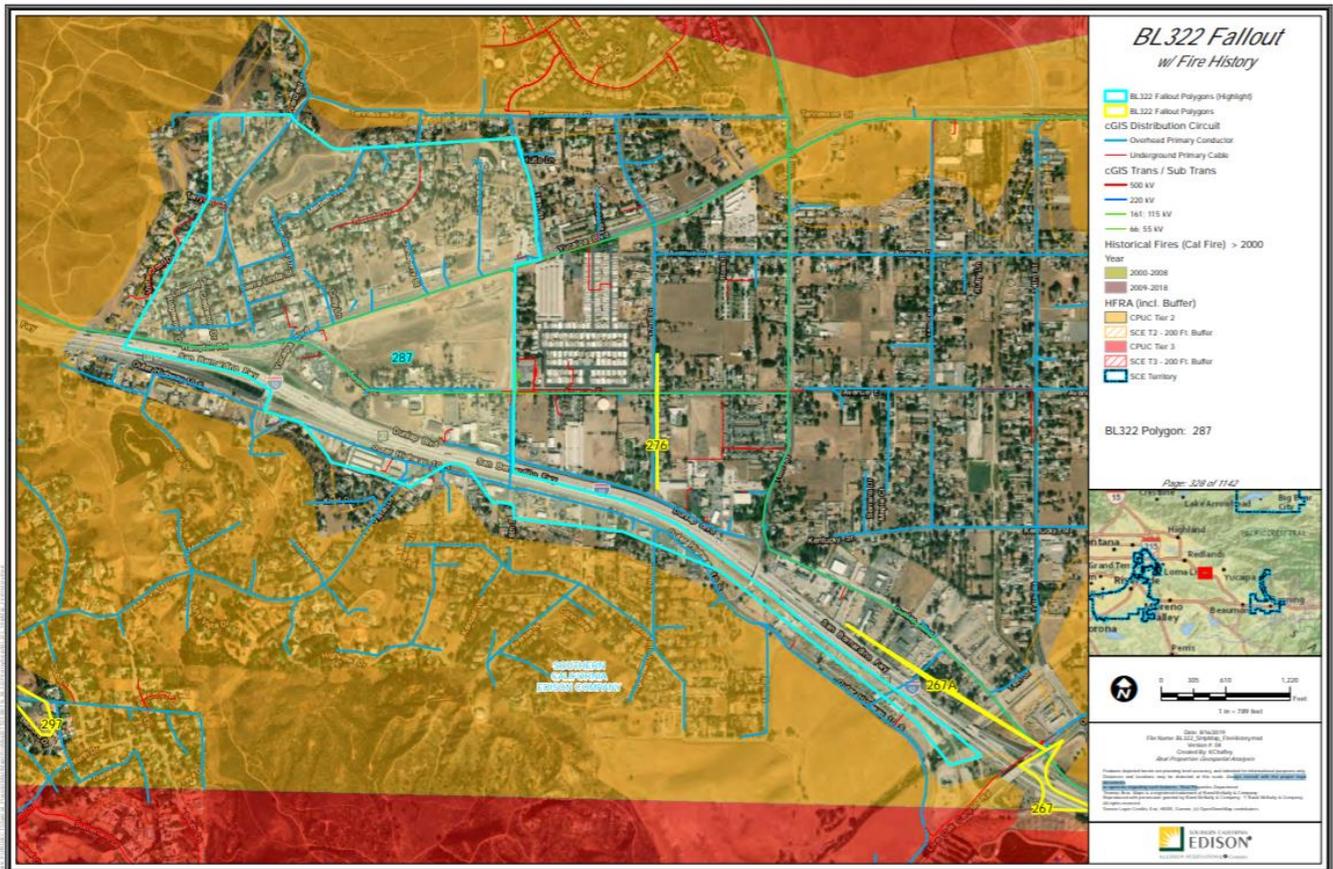
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
333	2,721	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

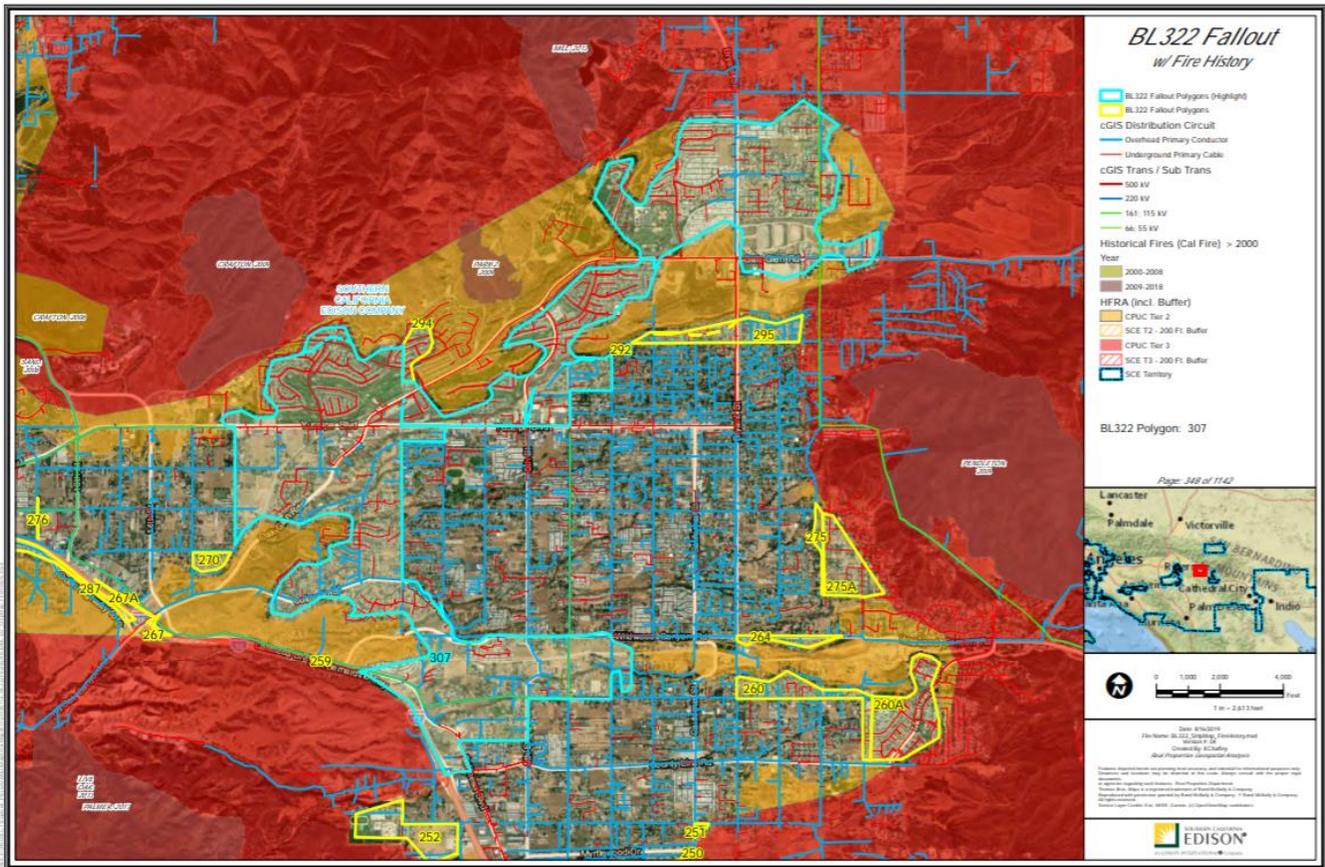| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
5.12	2.91	1.11	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
121	No	HERBACEOUS,URBAN

Yucaipa - Polygon ID #287 Tier 2 Inclusion Reasons

- High wind area, potential for a wind-driven fire to carry into the adjacent Tier 2 and Tier 3 areas
- Moderate fire history in adjacent areas (2006 Sand, 2006 Crafton, 2006 Edgemont)
- Wildfire consequence simulation results indicate high risk potential

Yucaipa – Polygon ID #307

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
1,703	42,410	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
18.76	38.17	2.47	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
432	No	AGRICULTURE,BARREN/OTHER,HARDWOOD,HERBACEOUS,SHRUB,URBAN,WATER

Yucaipa – Polygon ID #307 Tier 2 Inclusion Reasons

- High wind area, potential for a wind-driven fire to carry into the adjacent Tier 2 and Tier 3 areas
- Significant fire history in adjacent areas (2006 Crafton, 2006 Sand, 2009 Crafton, 2009 Park 2, 2009 Pendleton, 2013 Live Oak, 2017 Palmer, 2017 Bryant 2)
- Wildfire consequence simulation results indicate high risk potential

Santa Barbara County

Carpinteria – Polygon ID #443
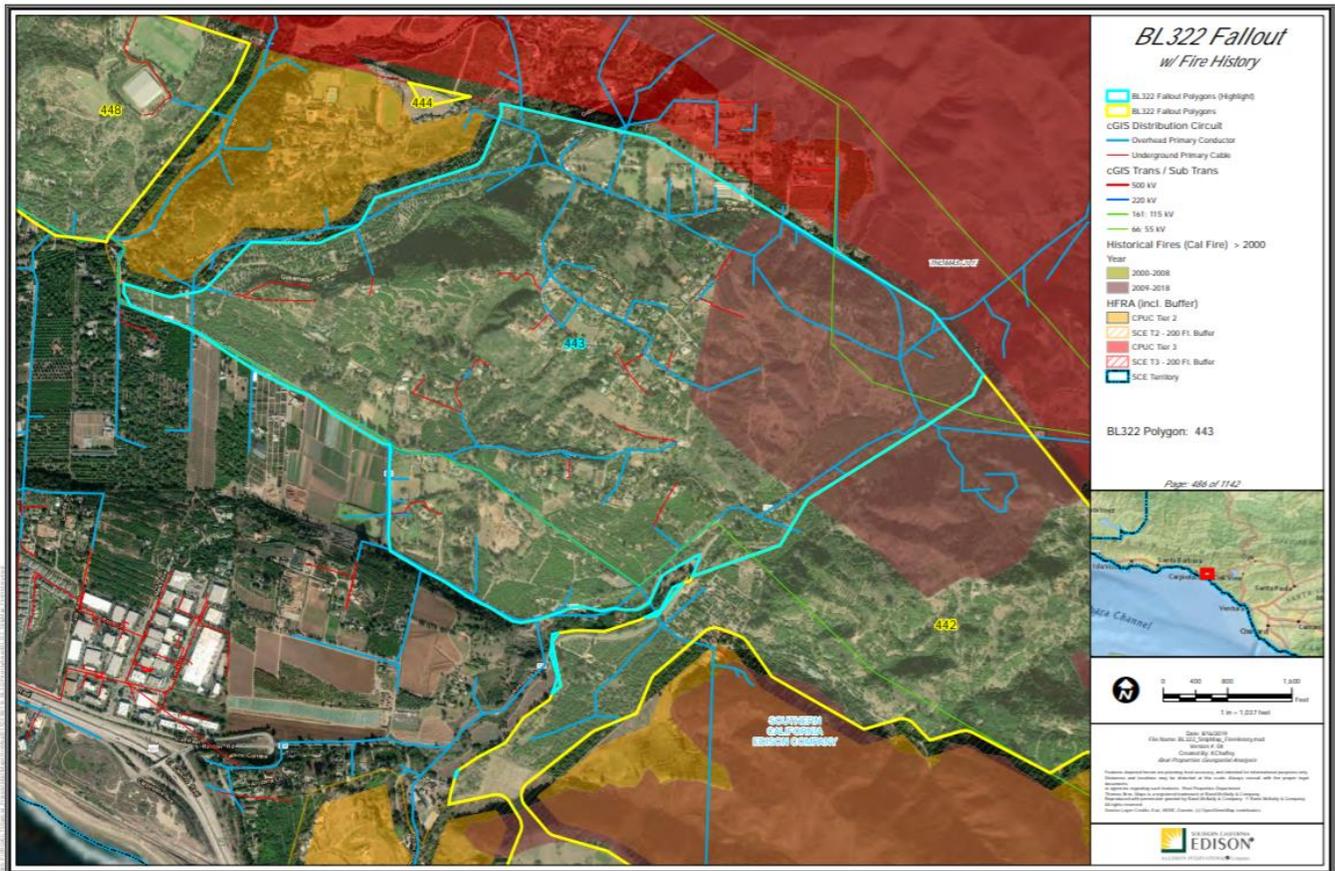
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
832	1,844	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

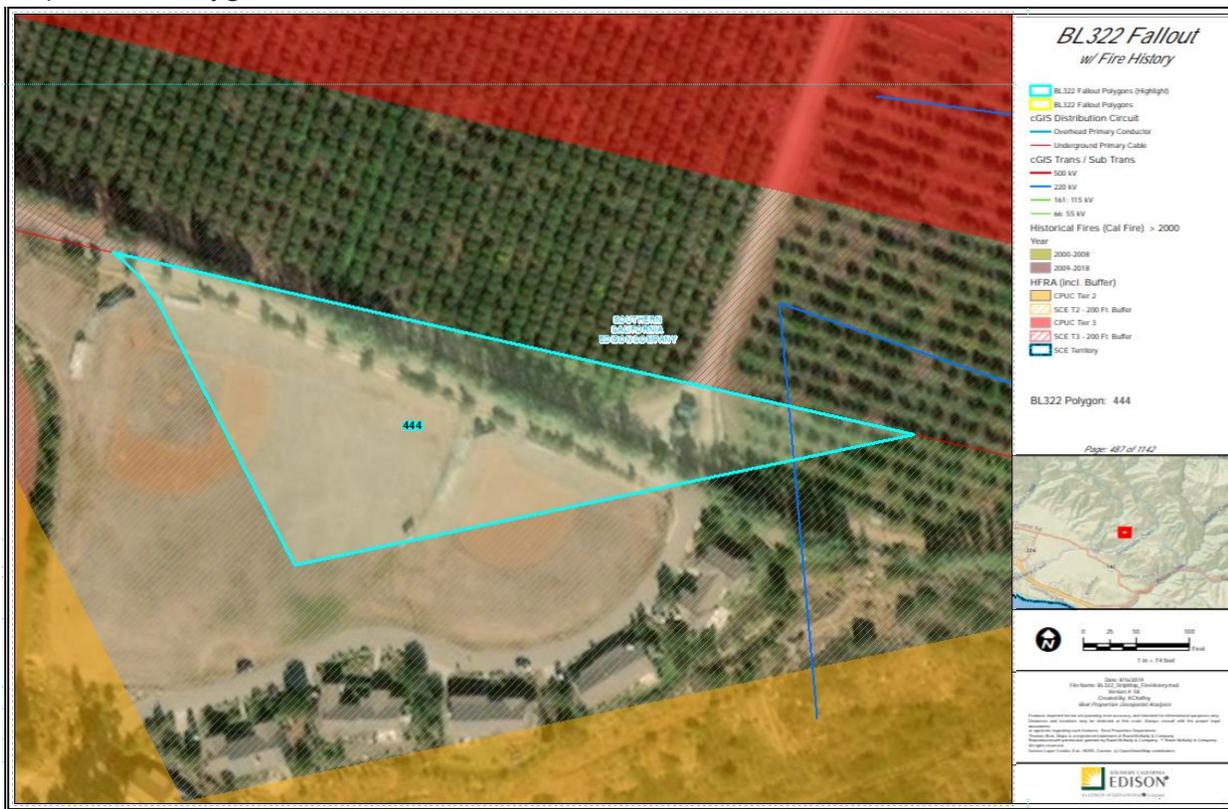| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
9.90	1.40	2.16	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
1	2017 Thomas	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
708	No	AGRICULTURE,BARREN/OTHER,HARDWOOD,HERBACEOUS,SHRUB,URBAN,WATER

Carpinteria – Polygon ID #443 Tier 2 Inclusion Reasons

- Hilly terrain
- Dense vegetation in the north
- Surrounded by Tier 2 and Tier 3 with fuel growth potential
- Fire history in areas within and adjacent to the polygon (2017 Thomas)
- Wildfire consequence simulation results indicate high risk potential

Carpinteria - Polygon ID #444

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
2	4	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
0.01	0.00	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
0	No	AGRICULTURE

Carpinteria - Polygon ID #444 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:

- Dense vegetation near the overhead; vegetation abuts a national forest
- Surrounded by Tier 2 and Tier 3 with fuel growth potential
- Fire history in areas adjacent to the polygon (2017 Thomas)

Carpinteria - Polygon ID #448

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk $\geq$1225?
717	1,449	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

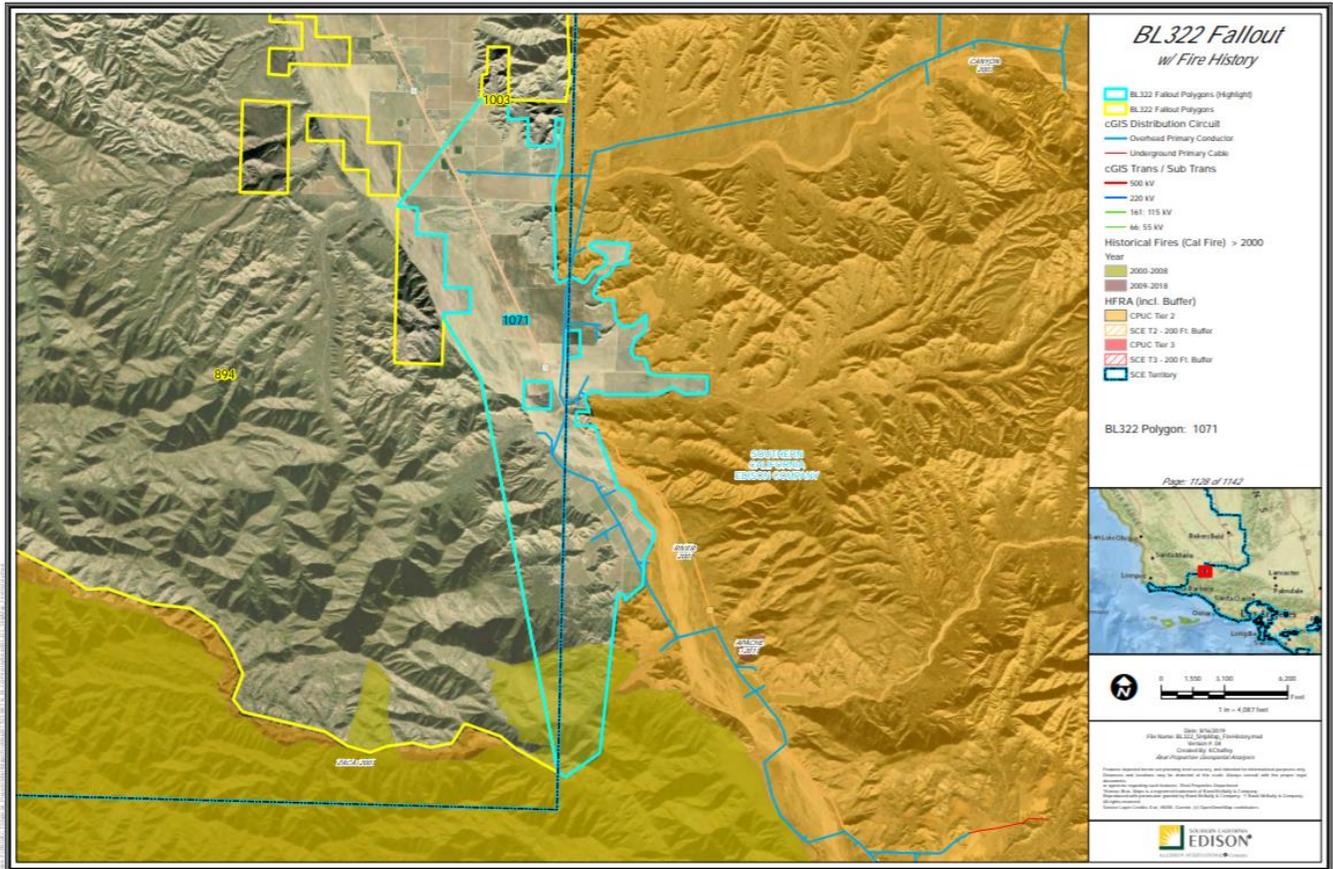| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
7.84	2.58	2.79	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
0	N/A	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
244	No	AGRICULTURE,BARREN/OTHER,HARDWOOD,HERBACEOUS,URBAN,WATER

Carpinteria - Polygon ID #448 Tier 2 Inclusion Reasons

- Hilly terrain
- Dense vegetation in the north
- Significant adjacency to Tier 2 and Tier 3 with fuel growth potential
- Fire history in areas adjacent to the polygon (2017 Thomas)
- Wildfire consequence simulation results indicate high risk potential

New Cuyama - Polygon ID #1071

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
717	343	No

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
5.95	0.00	0.00	0.00

Polygon Attributes

| No. of Previous Fires	List of Previous Fires	
1	2007 Zaca	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
15	Yes	AGRICULTURE,BARREN/OTHER,CONIFER,HERBACEOUS,SHRUB,URBAN,WATER

New Cuyama - Polygon ID #1071 Tier 2 Inclusion Reasons

Reax wildfire consequence resulted in a low risk score. However, we continue to recommend this polygon for inclusion for the following reasons:

- High wind area
- Remote area, isolated limited initial attack fire resources
- High probability for sustained fire with pockets of high fuel density.
- Fire history in areas within and adjacent to this polygon (2007 Zaca, 2007 River, 2017 Apache)
- Previously submitted to the CPUC for Tier 2 inclusion

Ventura County

Santa Paula - Polygon ID #420
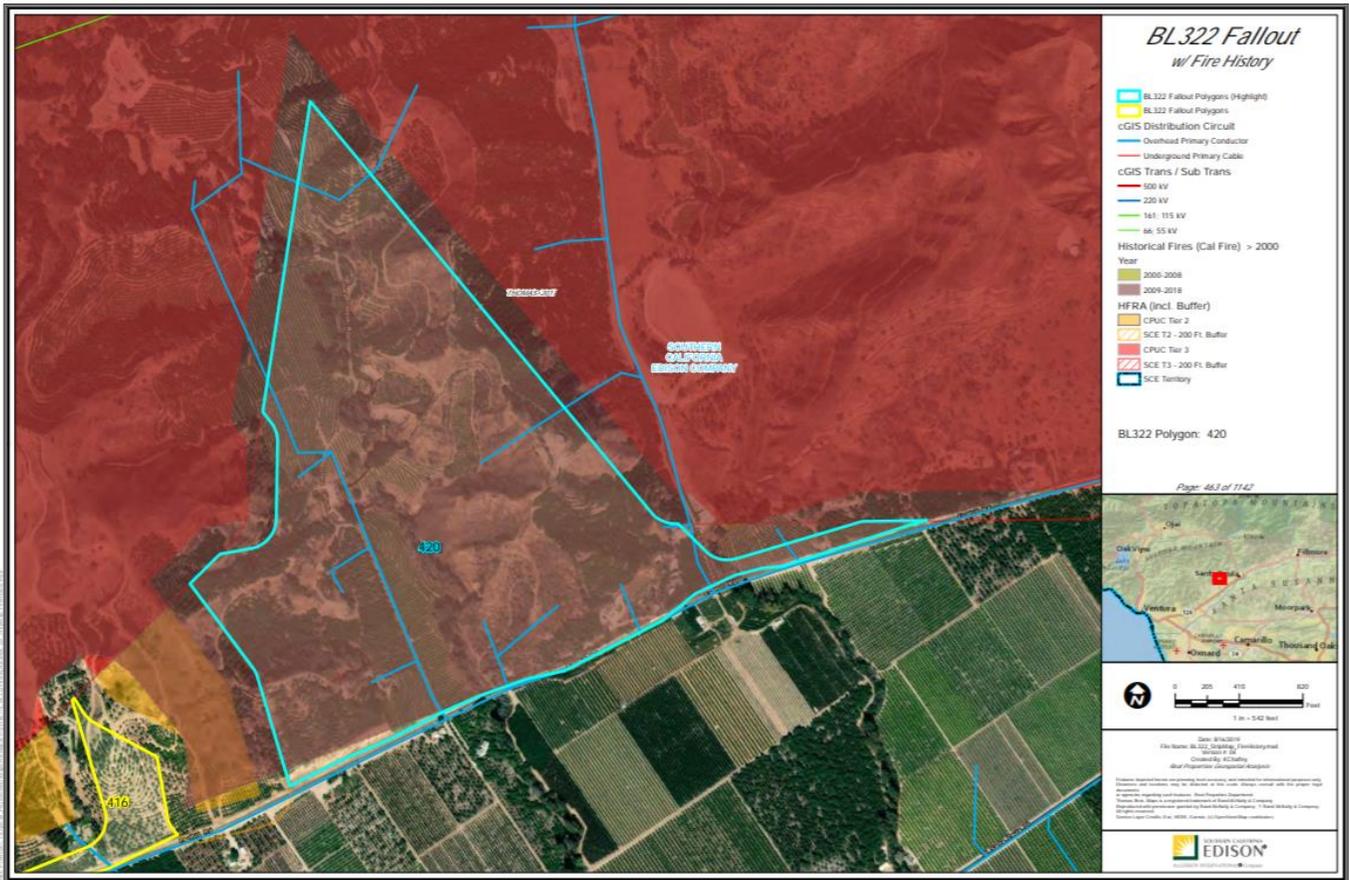
Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
141	68,866	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

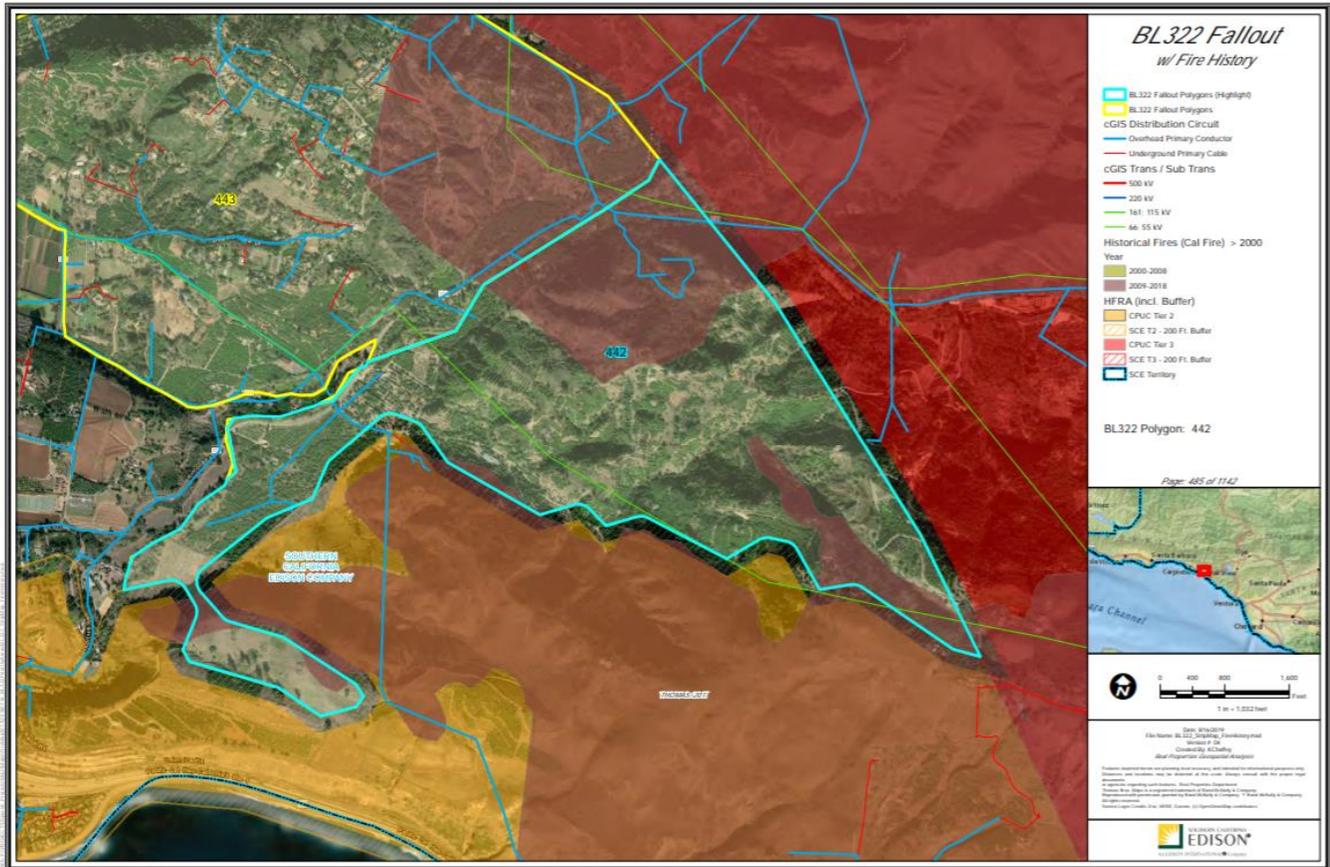| OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
1.28	0.00	0.00	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
1	2017 Thomas	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
23	No	AGRICULTURE,HARDWOOD,HERBACEOUS,SHRUB,URBAN

Santa Paula - Polygon ID #420 Tier 2 Inclusion Reasons

- Dense vegetation, uncultivated/undeveloped areas
- Remote area, isolated limited initial attack fire resources
- Fire history in this polygon (2017 Thomas)
- Wildfire consequence simulation results indicate a significantly high risk potential

Ventura - Polygon ID #442

Reax Engineering Wildfire Consequence Simulation Results

No. of Samples	Max Risk Score	Max Risk ≥1225?
342	1,459	Yes

SCE Overhead (OH) and Underground (UG) Primary Circuit Miles within the Polygon

OH Distribution Circuit Miles	UG Distribution Circuit Miles	OH Subtransmission Circuit Miles	OH Transmission Circuit Miles
1.51	0.05	1.21	0.00

Polygon Attributes

No. of Previous Fires	List of Previous Fires	
1	2017 Thomas	
Tree Trimming Counts	Tree Mortality Areas?	List of Fuels Within the Polygon (Data source: Cal Fire)
155	No	AGRICULTURE,BARREN/OTHER,HARDWOOD,HERBACEOUS,SHRUB,URBAN

Ventura - Polygon ID #442 Tier 2 Inclusion Reasons

- Hilly terrain
- Dense vegetation in the north
- Significant adjacencies to Tier 2 and Tier 3 with fuel growth potential
- Fire history in areas within and adjacent to the polygon (2017 Thomas)
- Wildfire consequence simulation results indicate high risk potential